

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK

ALLSTATE INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY, ALLSTATE FIRE &  
CASUALTY INSURANCE COMPANY, and  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY,

Plaintiffs,

- against -

EPIONE MEDICAL, P.C., APAK CHIROPRACTIC,  
P.C., MICHAEL Y. JACOBI, D.O., ALEKSANDR  
MOSTOVOY, D.C., WELLMART RX, INC., SIMON  
DAVYDOV, RUSLAN NEKTALOV aka RUSS  
NEKTA, EMANUEL DAVID aka EMANUEL  
DAVYDOV aka EMIK DAVYDOV, STELLA  
RAYTSIN, ELENA MUMIN-AKHUNOV,  
PRACTICE WIZ, INC. MBCC SUPPORT LTD dba  
BILLING PROS, and INNOVATIVE BUSINESS  
STRATEGIES, INC.,

Defendants.

**No. 1:21-cv-03970-BMC**

**DEMAND FOR JURY TRIAL**

**ANSWER OF DEFENDANTS ALEKSANDR MOSTOVOY, D.C. AND APAK  
CHIROPRACTIC, P.C.**

Defendants Aleksandr Mostovoy, D.C. and APAK Chiropractic, P.C., by and through their undersigned attorneys, hereby answer the Complaint dated July 14, 2021 [DE 1] filed by Plaintiffs Allstate Insurance Company, Allstate Indemnity Company, Allstate Fire & Casualty Insurance Company and Allstate Property & Casualty Insurance Company as follows:

**I. INTRODUCTION**

1. Defendants admit that paragraph 1 of the complaint purports to allege a claim that involves fraud but denies that the complaint states any causes of action for the same.

2. Defendants deny the allegations of paragraph 2 of the complaint.

3. Defendants deny the allegations of paragraph 3 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

4. Defendants deny the allegations of paragraph 4 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

5. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 5 of the complaint and therefore deny them.

6. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 6 of the complaint and therefore deny them.

7. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 7 of the complaint and therefore deny them.

8. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 8 of the complaint and therefore deny them.

9. Defendants deny the allegations of paragraph 9 of the complaint with respect to Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

10. Defendants deny the allegations of paragraph 10 of the complaint with respect to Mostovoy and APAK, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

11. Defendants deny the allegations of paragraph 11 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

12. Defendants deny the allegations of paragraph 12 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefor deny them.

13. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 13 of the complaint and therefore deny them.

14. Defendants deny the allegations of paragraph 14 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

15. Defendants deny the allegations of paragraph 15 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

16. Defendants deny the allegations of paragraph 16 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

17. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 17 of the complaint and therefore deny them.

18. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 18 of the complaint and therefore deny them.

19. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 19 of the complaint and therefore deny them.

20. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 20 of the complaint and therefore deny them.

21. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 21 of the complaint as they concern Epione and Wellmart. Defendants admit that some of APAK's patients were eligible for No-Fault coverage under

insurance policies issued by Allstate, but deny the remaining allegations of that paragraph.

22. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 22 of the complaint as they concern Epione and Wellmart. Defendants admit that the assignments of No-Fault benefits enabled APAK to seek payment directly from Allstate, but deny that these assignments were improper or illegal.

23. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 23 of the complaint as they concern the “Defendants”, Epione and Wellmart. Defendants admit that they authorized the submission of some claims documents to Allstate by U.S. Mail, but deny that these submissions by U.S. Mail were improper or illegal.

24. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 24 of the complaint as they concern Epione and Wellmart. Defendants admit that any submissions of claims by APAK to Allstate warranted that APAK was eligible to seek and collect No-Fault benefits, but deny that these submissions were improper or illegal.

25. Defendants deny the allegations of paragraph 25 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

26. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 26 of the complaint and therefore deny them.

27. Defendants deny the allegations of paragraph 27 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

28. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 28 of the complaint and therefore deny them.

29. Defendants deny the allegations of paragraph 29 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

30. Defendants admit that paragraph 30 of the complaint purports to allege claims for (a) violations of the federal Racketeer Influenced and Corrupt Organizations (RICO) Act, 18 U.S.C. § 1961, et seq.; (b) common-law fraud; and (c) unjust enrichment, but denies that the complaint states any causes of action for the same.

31. Defendants admit that paragraph 31 of the complaint purports to allege damages of more than \$1,682,127.00, but denies that the complaint alleges entitlement to damages, and denies the remaining allegations of that paragraph.

32. Defendants admit that paragraph 32 of the complaint purports to seek several declarations, but denies that the complaint alleges any entitlement to the same.

33. Defendants admit that paragraph 33 of the complaint purports to seek several declarations, but denies that the complaint alleges any entitlement to the same.

34. Due to the vagueness of the allegations, Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 34 of the complaint and therefore deny them.

35. Defendants deny the allegations of paragraph 35 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

36. Defendants deny the allegations of paragraph 36 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

37. Defendants admit the allegations of paragraph 37 of the complaint that the patients identified in this Complaint were eligible for insurance coverage pursuant to automobile insurance policies issued by Allstate, but deny that they engaged in any improper or illegal conduct.

38. Defendants deny the allegations of paragraph 38 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

## **II. THE PARTIES**

### **A. PLAINTIFFS**

39. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 39 of the complaint and therefore deny them.

40. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 40 of the complaint and therefore deny them.

### **B. DEFENDANTS**

#### **1. Healthcare Provider Defendants**

##### ***a. Michael Y. Jacobi, D.O.***

41. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 41 of the complaint and therefore deny them.

42. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 42 of the complaint and therefore deny them.

43. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 43 of the complaint and therefore deny them.

44. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 44 of the complaint and therefore deny them.

45. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 45 of the complaint and therefore deny them.

***b. Aleksandr Mostovoy, D.C.***

46. Defendants admit the allegations of paragraph 46 of the complaint.

47. Defendants admit the allegations of paragraph 47 of the complaint.

48. Defendants deny the allegations of paragraph 48 of the complaint.

49. Defendants deny the allegations of paragraph 49 of the complaint.

50. Defendants deny the allegations of paragraph 50 of the complaint.

**2. PC Defendants**

***a. Epione Medical, P.C.***

51. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 51 of the complaint and therefore deny them.

52. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 52 of the complaint and therefore deny them.

53. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 53 of the complaint and therefore deny them.

54. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 54 of the complaint and therefore deny them.

55. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 55 of the complaint and therefore deny them.

***b. APAK Chiropractic, P.C.***

56. Defendants admit the allegations of paragraph 56 of the complaint.

57. Defendants deny the allegations of paragraph 57 of the complaint.

58. Defendants deny the allegations of paragraph 58 of the complaint.

59. Defendants deny the allegations of paragraph 59 of the complaint.

60. Defendants deny the allegations of paragraph 60 of the complaint.

**3. Manager Defendants**

***a. Simon Davydov***

61. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 61 of the complaint and therefore deny them.

62. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 62 of the complaint and therefore deny them.

63. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 63 of the complaint and therefore deny them.

64. Defendants deny the allegations of paragraph 64 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

65. Defendants deny the allegations of paragraph 65 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

66. Defendants deny the allegations of paragraph 66 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

67. Defendants deny the allegations of paragraph 67 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth



of the remaining allegations of that paragraph and therefore deny them.

68. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 68 of the complaint and therefore deny them.

69. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 69 of the complaint and therefore deny them.

70. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 70 of the complaint and therefore deny them.

71. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 71 of the complaint and therefore deny them.

72. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 72 of the complaint and therefore deny them.

***b. Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov***

73. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 73 of the complaint and therefore deny them.

74. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 74 of the complaint and therefore deny them.

75. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 75 of the complaint and therefore deny them.

76. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 76 of the complaint and therefore deny them.

77. Defendants deny the allegations of paragraph 77 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

78. Defendants deny the allegations of paragraph 78 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

79. Defendants deny the allegations of paragraph 79 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

80. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 80 of the complaint and therefore deny them.

***c. Stella Raytsin***

81. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 81 of the complaint and therefore deny them.

82. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 82 of the complaint and therefore deny them.

83. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 83 of the complaint and therefore deny them.

84. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 84 of the complaint and therefore deny them.

85. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 85 of the complaint and therefore deny them.

86. Defendants deny the allegations of paragraph 86 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

87. Defendants deny the allegations of paragraph 87 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

88. Defendants deny the allegations of paragraph 88 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

89. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 89 of the complaint and therefore deny them.

***d. Elana Mumin-Akhunov***

90. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 90 of the complaint and therefore deny them.

91. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 91 of the complaint and therefore deny them.

92. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 92 of the complaint and therefore deny them.

93. Defendants deny the allegations of paragraph 93 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

94. Defendants deny the allegations of paragraph 94 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

95. Defendants deny the allegations of paragraph 95 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

96. Defendants deny the allegations of paragraph 96 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

97. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 97 of the complaint and therefore deny them.

**4. Management Companies**

***a. Practice Wiz, Inc.***

98. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 98 of the complaint and therefore deny them.

99. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 99 of the complaint and therefore deny them.

100. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 100 of the complaint and therefore deny them.

101. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 101 of the complaint and therefore deny them.

102. Defendants admit the allegations of paragraph 102 of the complaint that APAK entered into a medical practice consulting agreement with Practice Wiz, but deny the remaining allegations of that paragraph.

103. Defendants deny the allegations of paragraph 103 of the complaint.

104. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 104 of the complaint and therefore deny them.

***b. MBCC Support Ltd. d/b/a Billing Pros***

105. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 105 of the complaint and therefore deny them.

106. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 106 of the complaint and therefore deny them.

107. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 107 of the complaint and therefore deny them.

108. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 108 of the complaint and therefore deny them.

109. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 109 of the complaint and therefore deny them.

110. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 110 of the complaint and therefore deny them.

111. Defendants admit the allegations of paragraph 111 of the complaint that APAK entered into a billing service agreement with Billing Pros, but deny the remaining allegations of that paragraph.

112. Defendants deny the allegations of paragraph 112 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

***c. Innovative Business Strategies, Inc.***

113. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 113 of the complaint and therefore deny them

114. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 114 of the complaint and therefore deny them.

115. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 115 of the complaint and therefore deny them.

116. Defendants admit the allegations of paragraph 116 of the complaint that APAK entered into agreements with IBS, but deny the remaining allegations of that paragraph.

117. Defendants deny the allegations of paragraph 117 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**5. Wellmart Defendants**

***a. Wellmart Rx, Inc.***

118. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 118 of the complaint and therefore deny them.

119. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 119 of the complaint and therefore deny them.

120. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 120 of the complaint and therefore deny them.

121. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 121 of the complaint and therefore deny them.

122. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 122 of the complaint and therefore deny them.

123. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 123 of the complaint and therefore deny them.

124. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 124 of the complaint and therefore deny them.

125. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 125 of the complaint and therefore deny them.

***b. Ruslan Naktalov a/k/a Russ Nekta***

126. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 126 of the complaint and therefore deny them.

127. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 127 of the complaint and therefore deny them.

128. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 128 of the complaint and therefore deny them.

129. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 129 of the complaint and therefore deny them.

130. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 130 of the complaint and therefore deny them.

131. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 131 of the complaint and therefore deny them.

132. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 132 of the complaint and therefore deny them.

133. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 133 of the complaint and therefore deny them.

**III. JURISDICTION AND VENUE**

134. Defendants admit the allegations of paragraph 134 of the complaint that this Court has jurisdiction over claims asserted under 28 U.S.C. §§ 1331 and 1332 but denies that Plaintiffs state any claims giving rise to jurisdiction under these statutes.

135. Defendants admit the allegations of paragraph 135 of the complaint that this Court

has jurisdiction over claims asserted under 28 U.S.C. § 1367, but denies that Plaintiffs state any claims giving rise to jurisdiction under that statute.

136. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 136 of the complaint and therefore deny them.

137. Defendants deny the allegations of paragraph 137 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

138. Defendants deny the allegations of paragraph 138 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

139. Defendants deny the allegations of paragraph 139 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

#### **IV. APPLICABLE NO-FAULT LAWS AND LICENSING STATUTES**

##### **A. GENERAL OVERVIEW OF NEW YORK'S NO-FAULT LAWS**

140. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 140 of the complaint and therefore deny them.

141. Paragraph 141 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

142. Paragraph 142 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

143. Paragraph 143 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.



144. Paragraph 144 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

145. Paragraph 145 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

146. Paragraph 146 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

147. Paragraph 147 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

148. Paragraph 148 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

149. Paragraph 149 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

150. Paragraph 150 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

151. Paragraph 151 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

152. Paragraph 152 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

153. Paragraph 153 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

154. Paragraph 154 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

155. Paragraph 155 of the complaint is a purported statement of law, and not an

allegation of fact, and as such, no response is required.

**B. UNLAWFUL CONTROL OF PROFESSIONAL SERVICE CORPORATIONS**

156. Paragraph 156 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

157. Paragraph 157 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

158. Paragraph 158 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

159. Paragraph 159 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

160. Paragraph 160 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

161. Paragraph 161 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

162. Paragraph 162 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

163. Paragraph 163 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

164. Paragraph 164 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

165. Paragraph 165 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

166. Paragraph 166 of the complaint is a purported statement of law, and not an

allegation of fact, and as such, no response is required.

167. Paragraph 167 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

168. Paragraph 168 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

169. Paragraph 169 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

170. Paragraph 170 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

171. Paragraph 171 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

172. Paragraph 172 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

173. Paragraph 173 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

174. Paragraph 174 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

175. Paragraph 175 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

176. Paragraph 176 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

177. Defendants deny the allegations of paragraph 177 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

**C. REIMBURSEMENT FOR PRESCRIPTION DRUGS UNDER NEW YORK'S NO-FAULT LAWS**

178. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 178 of the complaint and therefore deny them.

179. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 179 of the complaint and therefore deny them.

180. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 180 of the complaint and therefore deny them.

181. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 181 of the complaint and therefore deny them.

182. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 182 of the complaint and therefore deny them.

183. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 183 of the complaint and therefore deny them.

184. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 184 of the complaint and therefore deny them.

185. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 185 of the complaint and therefore deny them.

186. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 186 of the complaint and therefore deny them.

**D. LAWS APPLICABLE TO COMPOUNDED PRODUCTS**

187. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 187 of the complaint and therefore deny them.

188. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 188 of the complaint and therefore deny them.

189. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 189 of the complaint and therefore deny them.

190. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 190 of the complaint and therefore deny them.

191. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 191 of the complaint and therefore deny them.

192. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 192 of the complaint and therefore deny them.

193. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 193 of the complaint and therefore deny them.

194. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 194 of the complaint and therefore deny them.

195. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 195 of the complaint and therefore deny them.

196. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 196 of the complaint and therefore deny them.

197. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 197 of the complaint and therefore deny them.

198. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 198 of the complaint and therefore deny them.

199. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 199 of the complaint and therefore deny them.

200. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 200 of the complaint and therefore deny them.

201. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 201 of the complaint and therefore deny them.

**V. FACTUAL ALLEGATIONS RELEVANT TO ALL CLAIMS**

**A. HISTORY OF THE DEFENDANTS' FRAUDULENT ACTIVITY**

202. Defendants deny the allegations of paragraph 202 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

203. Defendants deny the allegations of paragraph 203 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

204. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 204 of the complaint and therefore deny them.

205. Defendants deny the allegations of paragraph 205 of the complaint.

206. Defendants deny the allegations of paragraph 206 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

207. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 207 of the complaint and therefore deny them.

208. Defendants deny the allegations of paragraph 208 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

209. Defendants deny the allegations of paragraph 209 of the complaint with respect to APAK and Mostovoy, but admit that Defendants were wrongfully named in the lawsuits identified in paragraph 209, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

210. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 210 of the complaint and therefore deny them.

211. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 211 of the complaint and therefore deny them.

212. Defendants deny the allegations of paragraph 212 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

213. Defendants deny the allegations of paragraph 213 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

214. Defendants deny the allegations of paragraph 214 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

215. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 215 of the complaint and therefore deny them.

216. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 216 of the complaint and therefore deny them.

217. Defendants deny the allegations of paragraph 217 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

218. Defendants deny the allegations of paragraph 218 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

219. Defendants deny the allegations of paragraph 219 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

220. Defendants deny the allegations of paragraph 220 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**B. THE DEFENDANTS ARE ALL CONNECTED**

221. Defendants deny the allegations of paragraph 221 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

222. Defendants deny the allegations of paragraph 222 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

223. Defendants deny the allegations of paragraph 223 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**1. The Queens Village Clinic**

224. Defendants admit the allegations of paragraph 224 of the complaint that there is a medical clinic located at 218-02 – 218-08 Hempstead Avenue, Queens Village, New York, but lack knowledge or information sufficient to form a belief as to the truth of the remainder of the



allegations and therefore deny them.

225. Defendants deny the allegations of paragraph 225 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

226. Defendants admit the allegations of paragraph 226 of the complaint that APAK operated a clinic from the second floor of 218-02 Hempstead Avenue that was independent of the other Defendants named in this action, and deny the remainder of the allegations of that paragraph.

227. Defendants admit the allegations of paragraph 227 of the complaint that APAK operated a clinic from the second floor of 218-02 Hempstead Avenue that was independent of the other Defendants named in this action and that was correctly represented as an address that was independent of any other businesses, and deny the remainder of the allegations of that paragraph.

228. Defendants admit the allegations of paragraph 228 of the complaint that APAK operated a clinic from the second floor of 218-02 Hempstead Avenue that was independent of the other Defendants named in this action, and deny the remainder of the allegations of that paragraph.

229. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 229 of the complaint and therefore deny them.

230. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 230 of the complaint and therefore deny them.

231. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 231 of the complaint and therefore deny them.

232. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 232 of the complaint and therefore deny them.

233. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 233 of the complaint and therefore deny them.

234. Defendants deny the allegations of paragraph 234 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

235. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 235 of the complaint and therefore deny them.

**2. Uniform Operation of Epione and APAK**

236. Defendants deny the allegations of paragraph 236 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

237. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 237 of the complaint and therefore deny them.

238. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 238 of the complaint and therefore deny them.

239. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 239 of the complaint and therefore deny them.

240. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 240 of the complaint and therefore deny them.

241. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 241 of the complaint and therefore deny them.

242. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 242 of the complaint and therefore deny them.

243. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 243 of the complaint and therefore deny them.

244. Defendants deny the allegations of paragraph 244 of the complaint.

245. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 245 of the complaint and therefore deny them.

246. Defendants deny the allegations of paragraph 246 of the complaint

247. Defendants deny the allegations of paragraph 247 of the complaint.

**3. Davydov's Control Over Providers Installed at the Queens Village Clinic**

248. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 248 of the complaint and therefore deny them.

249. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 249 of the complaint and therefore deny them.

250. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 250 of the complaint and therefore deny them.

251. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 251 of the complaint and therefore deny them.

252. Defendants admit the allegations of paragraph 252 of the complaint.

253. Defendants deny the allegations of paragraph 253 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

254. Defendants deny the allegations of paragraph 254 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

255. Defendants deny the allegations of paragraph 255 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

256. Defendants deny the allegations of paragraph 256 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

257. Defendants deny the allegations of paragraph 257 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

258. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 258 of the complaint and therefore deny them.

259. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 259 of the complaint and therefore deny them.

260. Defendants deny the allegations of paragraph 260 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

261. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 261 of the complaint and therefore deny them.

262. Defendants deny the allegations of paragraph 262 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

263. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 263 of the complaint and therefore deny them.

264. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 264 of the complaint and therefore deny them.

265. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 265 of the complaint and therefore deny them.

266. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 266 of the complaint and therefore deny them.

267. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 267 of the complaint and therefore deny them.

268. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 268 of the complaint and therefore deny them.

269. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 269 of the complaint and therefore deny them.

270. Defendants deny the allegations of paragraph 270 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**C. UNLAWFUL OPERATION AND CONTROL OF PC DEFENDANTS**

271. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 271 of the complaint and therefore deny them.

272. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 272 of the complaint and therefore deny them.

273. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 273 of the complaint and therefore deny them.

274. Defendants deny the allegations of paragraph 274 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**1. Unlawful Operation and Control of Epione Medical, P.C.**

275. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 275 of the complaint and therefore deny them.

276. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 276 of the complaint and therefore deny them.

277. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 277 of the complaint and therefore deny them.

278. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 278 of the complaint and therefore deny them.

279. Defendants deny the allegations of paragraph 279 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

280. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 280 of the complaint and therefore deny them.

281. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 281 of the complaint and therefore deny them.

282. Defendants deny the allegations of paragraph 282 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

283. Defendants deny the allegations of paragraph 283 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

284. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 284 of the complaint and therefore deny them.

285. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 285 of the complaint and therefore deny them.

286. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 286 of the complaint and therefore deny them.

287. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 287 of the complaint and therefore deny them.

288. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 288 of the complaint and therefore deny them.

289. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 289 of the complaint and therefore deny them.

290. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 290 of the complaint and therefore deny them.

291. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 291 of the complaint and therefore deny them.

292. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 292 of the complaint and therefore deny them.

293. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 293 of the complaint and therefore deny them.

294. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 294 of the complaint and therefore deny them.

295. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 295 of the complaint and therefore deny them.

296. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 296 of the complaint and therefore deny them.

297. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 297 of the complaint and therefore deny them.

298. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 298 of the complaint and therefore deny them.

299. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 299 of the complaint and therefore deny them.

300. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 300 of the complaint and therefore deny them.

301. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 301 of the complaint and therefore deny them.

302. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 302 of the complaint and therefore deny them.

303. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 303 of the complaint and therefore deny them.

304. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 304 of the complaint and therefore deny them.

305. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 305 of the complaint and therefore deny them.

306. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 306 of the complaint and therefore deny them.

307. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 307 of the complaint and therefore deny them.



308. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 308 of the complaint and therefore deny them.

309. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 309 of the complaint and therefore deny them.

310. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 310 of the complaint and therefore deny them.

311. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 311 of the complaint and therefore deny them.

312. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 312 of the complaint and therefore deny them.

313. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 313 of the complaint and therefore deny them.

314. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 314 of the complaint and therefore deny them.

315. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 315 of the complaint and therefore deny them.

316. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 316 of the complaint and therefore deny them.

**2. Unlawful Operation of APAK Chiropractic, P.C.**

317. Defendants deny the allegations of paragraph 317 of the complaint.

318. Defendants admit the allegations of paragraph 318 of the complaint that previously Mostovoy was previously criminally charged in relation to his medical practice, but deny the remainder of the allegations of that paragraph.

319. Defendants deny the allegations of paragraph 319 of the complaint.

320. Defendants deny the allegations of paragraph 320 of the complaint.
321. Defendants deny the allegations of paragraph 321 of the complaint.
322. Defendants deny the allegations of paragraph 322 of the complaint.
323. Defendants deny the allegations of paragraph 323 of the complaint.
324. Defendants admit the allegations of paragraph 324 of the complaint.
325. Defendants deny the allegations of paragraph 325 of the complaint.
326. Defendants deny the allegations of paragraph 326 of the complaint.
327. Defendants admit the allegations of paragraph 327 of the complaint.
328. Defendants admit the allegations of paragraph 328 of the complaint that APAK entered into a marketing “agreement” with a company named IBS, but deny the remainder of the allegations of that paragraph.
329. Defendants admit the allegations of paragraph 329 of the complaint that APAK paid IBS \$9,500 every month for “marketing” services, but deny the remainder of the allegations of that paragraph.
330. Defendants deny the allegations of paragraph 330 of the complaint.
331. Defendants admit the allegations of paragraph 331 of the complaint.
332. Defendants admit the allegations of paragraph 332 of the complaint.
333. Defendants admit the allegations of paragraph 333 of the complaint.
334. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 334 of the complaint and therefore deny them.
335. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 335 of the complaint and therefore deny them.
336. Defendants admit the allegations of paragraph 336 of the complaint that APAK

paid Web Pro \$3,750 per month to develop and maintain a website, but deny the remainder of the allegations of that paragraph.

337. Defendants deny the allegations of paragraph 337 of the complaint.

338. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 338 of the complaint and therefore deny them.

339. Defendants admit the allegations of paragraph 339 of the complaint that Mostovoy had a business relationship with Davydov, but deny the remainder of the allegations of that paragraph.

340. Defendants admit the allegations of paragraph 340 of the complaint.

341. Defendants deny the allegations of paragraph 341 of the complaint.

342. Defendants admit the allegations of paragraph 342 of the complaint.

343. Defendants admit the allegations of paragraph 343 of the complaint.

344. Defendants admit the allegations of paragraph 344 of the complaint.

345. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 345 of the complaint and therefore deny them.

346. Defendants admit the allegations of paragraph 346 of the complaint that APAK paid Billing Pros between \$4,000 and \$5,000 per month for billing services, but deny the remainder of the allegations of that paragraph.

347. Defendants deny the allegations of paragraph 347 of the complaint.

348. Defendants deny the allegations of paragraph 348 of the complaint.

349. Defendants deny the allegations of paragraph 349 of the complaint.

350. Defendants deny the allegations of paragraph 350 of the complaint.

351. Defendants deny the allegations of paragraph 351 of the complaint.

**D. FRAUDULENT BILLING FOR SERVICES PROVIDED BY INDEPENDENT CONTRACTORS**

352. Defendants deny the allegations of paragraph 352 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

353. Paragraph 353 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

354. Paragraph 354 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

355. Defendants admit the allegations of paragraph 355 of the complaint that APAK billed Allstate for services provided by independent contractors, but deny the remainder of the allegations of that paragraph.

356. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 356 of the complaint and therefore deny them.

357. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 357 of the complaint and therefore deny them.

358. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 358 of the complaint and therefore deny them.

359. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 359 of the complaint and therefore deny them.

360. Defendants admit the allegations of paragraph 360 of the complaint.

361. Defendants admit the allegations of paragraph 361 of the complaint.

362. Defendants deny the allegations of paragraph 362 of the complaint.

363. Defendants deny the allegations of paragraph 363 of the complaint.

364. Defendants deny the allegations of paragraph 364 of the complaint.

365. Defendants deny the allegations of paragraph 365 of the complaint.

366. Paragraph 366 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

367. Paragraph 367 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

368. Paragraph 368 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

369. Defendants deny the allegations of paragraph 369 of the complaint.

370. Defendants deny the allegations of paragraph 370 of the complaint.

371. Defendants deny the allegations of paragraph 371 of the complaint.

**E. UNLAWFUL OPERATION OF WELLMART**

372. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 372 of the complaint and therefore deny them.

373. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 373 of the complaint and therefore deny them.

374. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 374 of the complaint and therefore deny them.

375. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 375 of the complaint and therefore deny them.

376. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 376 of the complaint and therefore deny them.

377. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 377 of the complaint and therefore deny them.

378. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 378 of the complaint and therefore deny them.

379. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 379 of the complaint and therefore deny them.

380. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 380 of the complaint and therefore deny them.

381. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 381 of the complaint and therefore deny them.

382. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 382 of the complaint and therefore deny them.

383. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 383 of the complaint and therefore deny them.

384. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 384 of the complaint and therefore deny them.

385. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 385 of the complaint and therefore deny them.

386. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 386 of the complaint and therefore deny them.

387. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 387 of the complaint and therefore deny them.

388. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 388 of the complaint and therefore deny them.

389. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 389 of the complaint and therefore deny them.

390. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 390 of the complaint and therefore deny them.

391. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 391 of the complaint and therefore deny them.

392. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 392 of the complaint and therefore deny them.

393. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 393 of the complaint and therefore deny them.

394. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 394 of the complaint and therefore deny them.

395. Defendants deny the allegations of paragraph 395 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

396. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 396 of the complaint and therefore deny them.

**F. FRAUDULENT PHARMACY SERVICES**

**1. Predetermined Protocol of Drugs and Medications**

397. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 397 of the complaint and therefore deny them.

398. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 398 of the complaint and therefore deny them.

399. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 399 of the complaint and therefore deny them.

400. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 400 of the complaint and therefore deny them.

401. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 401 of the complaint and therefore deny them.

402. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 402 of the complaint and therefore deny them.

403. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 403 of the complaint and therefore deny them.

404. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 404 of the complaint and therefore deny them.

405. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 405 of the complaint and therefore deny them.

406. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 406 of the complaint and therefore deny them.

407. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 407 of the complaint and therefore deny them.

## **2. Medically Worthless Compounded Products**

408. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 408 of the complaint and therefore deny them.

409. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 409 of the complaint and therefore deny them.

410. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 410 of the complaint and therefore deny them.

411. Defendants lack knowledge or information sufficient to form a belief as to the truth



of the allegations of paragraph 411 of the complaint and therefore deny them.

412. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 412 of the complaint and therefore deny them.

413. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 413 of the complaint and therefore deny them.

414. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 414 of the complaint and therefore deny them.

415. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 415 of the complaint and therefore deny them.

416. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 416 of the complaint and therefore deny them.

417. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 417 of the complaint and therefore deny them.

418. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 418 of the complaint and therefore deny them.

419. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 419 of the complaint and therefore deny them.

420. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 420 of the complaint and therefore deny them.

421. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 421 of the complaint and therefore deny them.

422. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 422 of the complaint and therefore deny them.

423. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 423 of the complaint and therefore deny them.

***a. No Clinical Basis for Compounded Products***

424. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 424 of the complaint and therefore deny them.

425. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 425 of the complaint and therefore deny them.

426. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 426 of the complaint and therefore deny them.

427. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 427 of the complaint and therefore deny them.

428. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 428 of the complaint and therefore deny them.

429. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 429 of the complaint and therefore deny them.

430. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 430 of the complaint and therefore deny them.

431. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 431 of the complaint and therefore deny them.

432. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 432 of the complaint and therefore deny them.

433. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 433 of the complaint and therefore deny them.

***b. No Unique Tailoring of Compounded Products***

434. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 434 of the complaint and therefore deny them.

435. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 435 of the complaint and therefore deny them.

436. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 436 of the complaint and therefore deny them.

437. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 437 of the complaint and therefore deny them.

438. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 438 of the complaint and therefore deny them. of the Complaint.

439. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 439 of the complaint and therefore deny them.

440. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 440 of the complaint and therefore deny them.

441. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 441 of the complaint and therefore deny them.

442. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 442 of the complaint and therefore deny them.

443. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 443 of the complaint and therefore deny them.

444. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 444 of the complaint and therefore deny them.

445. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 445 of the complaint and therefore deny them.

446. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 446 of the complaint and therefore deny them.

447. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 447 of the complaint and therefore deny them.

448. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 448 of the complaint and therefore deny them.

449. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 449 of the complaint and therefore deny them.

450. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 450 of the complaint and therefore deny them.

451. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 451 of the complaint and therefore deny them.

452. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 452 of the complaint and therefore deny them.

453. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 453 of the complaint and therefore deny them.

454. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 454 of the complaint and therefore deny them.

455. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 455 of the complaint and therefore deny them.

456. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 456 of the complaint and therefore deny them.

457. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 457 of the complaint and therefore deny them.

***c. Unlawful Template Prescriptions for Compounded Products***

458. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 458 of the complaint and therefore deny them.

459. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 459 of the complaint and therefore deny them.

460. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 460 of the complaint and therefore deny them.

461. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 461 of the complaint and therefore deny them.

462. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 462 of the complaint and therefore deny them.

463. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 463 of the complaint and therefore deny them.

***d. Fraudulent Billing for Compounded Products***

464. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 464 of the complaint and therefore deny them.

465. Paragraph 465 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

466. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 466 of the complaint and therefore deny them.

467. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 467 of the complaint and therefore deny them.

468. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 468 of the complaint and therefore deny them.

469. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 469 of the complaint and therefore deny them.

470. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 470 of the complaint and therefore deny them.

471. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 471 of the complaint and therefore deny them.

472. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 472 of the complaint and therefore deny them.

473. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 473 of the complaint and therefore deny them.

***e. Specific Examples of Fraudulent Billing for Medically  
Unnecessary and Falsely Charged Compounded Products***

***i. Patient F.B. (claim no. 0446692139)***

474. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 474 of the complaint and therefore deny them.

475. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 475 of the complaint and therefore deny them.

476. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 476 of the complaint and therefore deny them.

477. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 477 of the complaint and therefore deny them.

478. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 478 of the complaint and therefore deny them.

479. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 479 of the complaint and therefore deny them.

480. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 480 of the complaint and therefore deny them.

481. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 481 of the complaint and therefore deny them.

482. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 482 of the complaint and therefore deny them.

483. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 483 of the complaint and therefore deny them.

484. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 484 of the complaint and therefore deny them.

485. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 485 of the complaint and therefore deny them.

**ii. Patient K.G. (claim no. 0398874248)**

486. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 486 of the complaint and therefore deny them.

487. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 487 of the complaint and therefore deny them.

488. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 488 of the complaint and therefore deny them.

489. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 489 of the complaint and therefore deny them.

490. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 490 of the complaint and therefore deny them.

491. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 491 of the complaint and therefore deny them.

492. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 492 of the complaint and therefore deny them.

493. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 493 of the complaint and therefore deny them.

494. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 494 of the complaint and therefore deny them.

495. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 495 of the complaint and therefore deny them.

496. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 496 of the complaint and therefore deny them.

497. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 497 of the complaint and therefore deny them.

498. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 498 of the complaint and therefore deny them.

**iii. Patient S.T. (claim no. 0392421616)**

499. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 499 of the complaint and therefore deny them.

500. Defendants lack knowledge or information sufficient to form a belief as to the truth



of the allegations of paragraph 500 of the complaint and therefore deny them.

501. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 501 of the complaint and therefore deny them.

502. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 502 of the complaint and therefore deny them.

503. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 503 of the complaint and therefore deny them.

504. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 504 of the complaint and therefore deny them.

505. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 505 of the complaint and therefore deny them.

506. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 506 of the complaint and therefore deny them.

507. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 507 of the complaint and therefore deny them.

508. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 508 of the complaint and therefore deny them.

509. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 509 of the complaint and therefore deny them.

510. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 510 of the complaint and therefore deny them.

**iv. Patient R.D. (claim no. 0445301666)**

511. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 511 of the complaint and therefore deny them.

512. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 512 of the complaint and therefore deny them.

513. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 513 of the complaint and therefore deny them.

514. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 514 of the complaint and therefore deny them.

515. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 515 of the complaint and therefore deny them.

516. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 516 of the complaint and therefore deny them.

517. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 517 of the complaint and therefore deny them.

518. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 518 of the complaint and therefore deny them.

519. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 519 of the complaint and therefore deny them.

520. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 520 of the complaint and therefore deny them.

521. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 521 of the complaint and therefore deny them.

v. **Patient S.S. (claim no. 0439365941)**

522. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 522 of the complaint and therefore deny them.

523. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 523 of the complaint and therefore deny them.

524. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 524 of the complaint and therefore deny them.

525. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 525 of the complaint and therefore deny them.

526. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 526 of the complaint and therefore deny them.

527. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 527 of the complaint and therefore deny them.

528. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 528 of the complaint and therefore deny them.

529. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 529 of the complaint and therefore deny them.

530. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 530 of the complaint and therefore deny them.

531. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 531 of the complaint and therefore deny them.

532. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 532 of the complaint and therefore deny them.

533. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 533 of the complaint and therefore deny them.

**vi. Patient M.J. (claim no. 0452224330)**

534. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 534 of the complaint and therefore deny them.

535. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 535 of the complaint and therefore deny them.

536. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 536 of the complaint and therefore deny them.

537. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 537 of the complaint and therefore deny them.

538. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 538 of the complaint and therefore deny them.

539. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 539 of the complaint and therefore deny them.

540. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 540 of the complaint and therefore deny them.

541. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 541 of the complaint and therefore deny them.

542. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 542 of the complaint and therefore deny them.

543. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 543 of the complaint and therefore deny them.

544. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 544 of the complaint and therefore deny them.

545. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 545 of the complaint and therefore deny them.

546. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 546 of the complaint and therefore deny them.

**3. Billing for Medically Worthless Topical Pain Patches**

547. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 547 of the complaint and therefore deny them.

548. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 548 of the complaint and therefore deny them.

549. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 549 of the complaint and therefore deny them.

550. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 550 of the complaint and therefore deny them.

551. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 551 of the complaint and therefore deny them.

552. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 552 of the complaint and therefore deny them.

553. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 553 of the complaint and therefore deny them.

554. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 554 of the complaint and therefore deny them.

555. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 555 of the complaint and therefore deny them.

***a. False Billing for Non-Prescription Drugs***

556. Paragraph 556 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

557. Paragraph 557 of the complaint is a purported statement of law, and not an

allegation of fact, and as such, no response is required.

558. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 558 of the complaint and therefore deny them.

559. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 559 of the complaint and therefore deny them.

560. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 560 of the complaint and therefore deny them.

561. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 561 of the complaint and therefore deny them.

562. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 562 of the complaint and therefore deny them.

563. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 563 of the complaint and therefore deny them.

564. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 564 of the complaint and therefore deny them.

565. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 565 of the complaint and therefore deny them.

566. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 566 of the complaint and therefore deny them.

567. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 567 of the complaint and therefore deny them.

568. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 568 of the complaint and therefore deny them.

***b. Excessive Billing for Topical Pain Patches***

569. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 569 of the complaint and therefore deny them.

570. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 570 of the complaint and therefore deny them.

571. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 571 of the complaint and therefore deny them.

572. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 572 of the complaint and therefore deny them.

573. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 573 of the complaint and therefore deny them.

574. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 574 of the complaint and therefore deny them.

575. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 575 of the complaint and therefore deny them.

576. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 576 of the complaint and therefore deny them.

577. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 577 of the complaint and therefore deny them.

578. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 578 of the complaint and therefore deny them.

579. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 579 of the complaint and therefore deny them.

580. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 580 of the complaint and therefore deny them.

581. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 581 of the complaint and therefore deny them.

582. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 582 of the complaint and therefore deny them.

583. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 583 of the complaint and therefore deny them.

584. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 584 of the complaint and therefore deny them.

585. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 585 of the complaint and therefore deny them.

**4. Billing for Medically Unnecessary and Ineffective Diclofenac Sodium Gel 3%**

586. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 586 of the complaint and therefore deny them.

587. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 587 of the complaint and therefore deny them.

588. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 588 of the complaint and therefore deny them.

589. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 589 of the complaint and therefore deny them.

590. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 590 of the complaint and therefore deny them.

591. Defendants lack knowledge or information sufficient to form a belief as to the truth



of the allegations of paragraph 591 of the complaint and therefore deny them.

592. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 592 of the complaint and therefore deny them.

593. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 593 of the complaint and therefore deny them.

594. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 594 of the complaint and therefore deny them.

595. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 595 of the complaint and therefore deny them.

596. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 596 of the complaint and therefore deny them.

597. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 597 of the complaint and therefore deny them.

598. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 598 of the complaint and therefore deny them.

***a. Inflated and Excessive Billing for Diclofenac Sodium Gel 3%***

599. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 599 of the complaint and therefore deny them.

600. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 600 of the complaint and therefore deny them.

601. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 601 of the complaint and therefore deny them.

602. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 602 of the complaint and therefore deny them.

603. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 603 of the complaint and therefore deny them.

604. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 604 of the complaint and therefore deny them.

605. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 605 of the complaint and therefore deny them.

***b. Specific Examples of Fraudulent Billing for Medically Unnecessary Diclofenac Sodium Gel 3%***

***i. Patient J.W. (claim no. 0498920859)***

606. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 606 of the complaint and therefore deny them.

607. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 607 of the complaint and therefore deny them.

608. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 608 of the complaint and therefore deny them.

609. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 609 of the complaint and therefore deny them.

610. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 610 of the complaint and therefore deny them.

611. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 611 of the complaint and therefore deny them.

612. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 612 of the complaint and therefore deny them.

613. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 613 of the complaint and therefore deny them.

614. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 614 of the complaint and therefore deny them.

**ii. Patient S.H. (claim no. 0504308388)**

615. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 615 of the complaint and therefore deny them.

616. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 616 of the complaint and therefore deny them.

617. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 617 of the complaint and therefore deny them.

618. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 618 of the complaint and therefore deny them.

619. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 619 of the complaint and therefore deny them.

620. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 620 of the complaint and therefore deny them.

621. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 621 of the complaint and therefore deny them.

622. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 622 of the complaint and therefore deny them.

623. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 623 of the complaint and therefore deny them.

**iii. Patient J.P. (claim no. 0504308388)**

624. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 624 of the complaint and therefore deny them.

625. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 625 of the complaint and therefore deny them.

626. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 626 of the complaint and therefore deny them.

627. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 627 of the complaint and therefore deny them.

628. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 628 of the complaint and therefore deny them.

629. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 629 of the complaint and therefore deny them.

630. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 630 of the complaint and therefore deny them.

631. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 631 of the complaint and therefore deny them.

632. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 632 of the complaint and therefore deny them.

**iv. Patient L.T. (claim no. 0489759232)**

633. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 633 of the complaint and therefore deny them.

634. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 634 of the complaint and therefore deny them.

635. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 635 of the complaint and therefore deny them.

636. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 636 of the complaint and therefore deny them.

637. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 637 of the complaint and therefore deny them.

638. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 638 of the complaint and therefore deny them.

639. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 639 of the complaint and therefore deny them.

640. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 640 of the complaint and therefore deny them.

641. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 641 of the complaint and therefore deny them.

642. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 642 of the complaint and therefore deny them.

643. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 643 of the complaint and therefore deny them.

644. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 644 of the complaint and therefore deny them.

645. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 645 of the complaint and therefore deny them.

646. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 646 of the complaint and therefore deny them.

**v. Patient M.G. (claim no. 0493222681)**

647. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 647 of the complaint and therefore deny them.

648. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 648 of the complaint and therefore deny them.

649. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 649 of the complaint and therefore deny them.

650. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 650 of the complaint and therefore deny them.

651. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 651 of the complaint and therefore deny them.

652. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 652 of the complaint and therefore deny them.

653. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 653 of the complaint and therefore deny them.

654. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 654 of the complaint and therefore deny them.

655. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 655 of the complaint and therefore deny them.

**5. Inflated and Excessive Billing for Prescription Drugs**

656. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 656 of the complaint and therefore deny them.

657. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 657 of the complaint and therefore deny them.

658. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 658 of the complaint and therefore deny them.

659. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 659 of the complaint and therefore deny them.

660. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 660 of the complaint and therefore deny them.

661. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 661 of the complaint and therefore deny them.

662. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 662 of the complaint and therefore deny them.

663. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 663 of the complaint and therefore deny them.

664. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 664 of the complaint and therefore deny them.

665. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 665 of the complaint and therefore deny them.

**6. Wellmart's Unlawful Relationship with Prescribing Providers**

666. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 666 of the complaint and therefore deny them.

667. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 667 of the complaint and therefore deny them.

668. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 668 of the complaint and therefore deny them.

669. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 669 of the complaint and therefore deny them.

670. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 670 of the complaint and therefore deny them.

671. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 671 of the complaint and therefore deny them.

672. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of 672 of the complaint and therefore deny them.

673. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 673 of the complaint and therefore deny them.

674. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 674 of the complaint and therefore deny them.

675. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 675 of the complaint and therefore deny them.

676. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 676 of the complaint and therefore deny them.

677. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 677 of the complaint and therefore deny them.

678. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 678 of the complaint and therefore deny them.

**F. BILLING FOR FRAUDULENT MEDICAL SERVICES**

679. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 679 of the complaint and therefore deny them.

680. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 680 of the complaint and therefore deny them.

681. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 681 of the complaint and therefore deny them.



682. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 682 of the complaint and therefore deny them.

683. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 683 of the complaint and therefore deny them.

684. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 684 of the complaint and therefore deny them.

685. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 685 of the complaint and therefore deny them.

**1. Falsely Charged Initial Examinations**

686. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 686 of the complaint and therefore deny them.

687. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 687 of the complaint and therefore deny them.

688. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 688 of the complaint and therefore deny them.

689. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 689 of the complaint and therefore deny them.

690. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 690 of the complaint and therefore deny them.

691. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 691 of the complaint and therefore deny them.

692. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 692 of the complaint and therefore deny them.

693. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 693 of the complaint and therefore deny them.

694. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 694 of the complaint and therefore deny them.

695. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 695 of the complaint and therefore deny them.

696. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 696 of the complaint and therefore deny them.

697. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 697 of the complaint and therefore deny them.

698. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 698 of the complaint and therefore deny them.

699. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 699 of the complaint and therefore deny them.

700. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 700 of the complaint and therefore deny them.

701. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 701 of the complaint and therefore deny them.

702. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 702 of the complaint and therefore deny them.

703. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 703 of the complaint and therefore deny them.

704. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 704 of the complaint and therefore deny them.

705. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 705 of the complaint and therefore deny them.

706. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 706 of the complaint and therefore deny them.

707. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 707 of the complaint and therefore deny them.

708. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 708 of the complaint and therefore deny them.

709. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 709 of the complaint and therefore deny them.

710. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 710 of the complaint and therefore deny them.

711. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 711 of the complaint and therefore deny them.

712. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 712 of the complaint and therefore deny them.

713. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 713 of the complaint and therefore deny them.

714. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 714 of the complaint and therefore deny them.

715. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 715 of the complaint and therefore deny them.

716. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 716 of the complaint and therefore deny them.

717. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 717 of the complaint and therefore deny them.

718. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 718 of the complaint and therefore deny them.

719. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 719 of the complaint and therefore deny them.

720. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 720 of the complaint and therefore deny them.

721. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 721 of the complaint and therefore deny them.

## **2. Excessive Physical Therapy and Chiropractic Treatment**

722. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 722 of the complaint and therefore deny them.

723. Defendants deny the allegations of paragraph 723 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

724. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 724 of the complaint and therefore deny them.

725. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 725 of the complaint and therefore deny them.

726. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 726 of the complaint and therefore deny them.

727. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 727 of the complaint and therefore deny them.

728. Defendants deny the allegations of paragraph 728 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

729. Defendants deny the allegations of paragraph 729 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

730. Defendants deny the allegations of paragraph 730 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

731. Defendants deny the allegations of paragraph 731 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

### **3. Unnecessary Outcome Assessment Testing**

732. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 732 of the complaint and therefore deny them.

733. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 733 of the complaint and therefore deny them.

734. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 734 of the complaint and therefore deny them.

735. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 735 of the complaint and therefore deny them.

736. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 736 of the complaint and therefore deny them.

737. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 737 of the complaint and therefore deny them.

738. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 738 of the complaint and therefore deny them.

739. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 739 of the complaint and therefore deny them.

**4. Fraudulent Range of Motion Testing**

740. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 740 of the complaint and therefore deny them.

741. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 741 of the complaint and therefore deny them.

742. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 742 of the complaint and therefore deny them.

743. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 743 of the complaint and therefore deny them.

744. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 744 of the complaint and therefore deny them.

745. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 745 of the complaint and therefore deny them.

746. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 746 of the complaint and therefore deny them.

747. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 747 of the complaint and therefore deny them.

748. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 748 of the complaint and therefore deny them.

749. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 749 of the complaint and therefore deny them.

750. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 750 of the complaint and therefore deny them.

751. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 751 of the complaint and therefore deny them.

752. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 752 of the complaint and therefore deny them.

753. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 753 of the complaint and therefore deny them.

754. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 754 of the complaint and therefore deny them.

755. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 755 of the complaint and therefore deny them.

756. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 756 of the complaint and therefore deny them.

757. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 757 of the complaint and therefore deny them.

758. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 758 of the complaint and therefore deny them.

759. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 759 of the complaint and therefore deny them.

760. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 760 of the complaint and therefore deny them.

761. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 761 of the complaint and therefore deny them.

762. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 762 of the complaint and therefore deny them.

763. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 763 of the complaint and therefore deny them.

764. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 764 of the complaint and therefore deny them.

765. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 765 of the complaint and therefore deny them.

766. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 766 of the complaint and therefore deny them.

767. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 767 of the complaint and therefore deny them.

**5. Fraudulent Muscle Strength Testing**

768. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 768 of the complaint and therefore deny them.

769. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 769 of the complaint and therefore deny them.

770. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 770 of the complaint and therefore deny them.

771. Defendants lack knowledge or information sufficient to form a belief as to the truth



of the allegations of paragraph 771 of the complaint and therefore deny them.

772. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 772 of the complaint and therefore deny them.

773. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 773 of the complaint and therefore deny them.

774. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 774 of the complaint and therefore deny them.

775. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 775 of the complaint and therefore deny them.

776. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 776 of the complaint and therefore deny them.

777. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 777 of the complaint and therefore deny them.

778. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 778 of the complaint and therefore deny them.

779. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 779 of the complaint and therefore deny them.

780. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 780 of the complaint and therefore deny them.

781. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 781 of the complaint and therefore deny them.

782. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 782 of the complaint and therefore deny them.

783. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 783 of the complaint and therefore deny them.

784. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 784 of the complaint and therefore deny them.

785. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 785 of the complaint and therefore deny them.

786. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 786 of the complaint and therefore deny them.

787. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 787 of the complaint and therefore deny them.

788. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 788 of the complaint and therefore deny them.

**6. Medically Unnecessary Electrodiagnostic Testing**

789. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 789 of the complaint and therefore deny them.

790. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 790 of the complaint and therefore deny them.

791. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 791 of the complaint and therefore deny them.

792. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 792 of the complaint and therefore deny them.

793. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 793 of the complaint and therefore deny them.

794. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 794 of the complaint and therefore deny them.

795. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 795 of the complaint and therefore deny them.

796. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 796 of the complaint and therefore deny them.

797. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 797 of the complaint and therefore deny them.

798. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 798 of the complaint and therefore deny them.

799. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 799 of the complaint and therefore deny them.

800. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 800 of the complaint and therefore deny them.

801. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 801 of the complaint and therefore deny them.

802. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 802 of the complaint and therefore deny them.

803. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 803 of the complaint and therefore deny them.

804. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 804 of the complaint and therefore deny them.

805. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 805 of the complaint and therefore deny them.

806. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 806 of the complaint and therefore deny them.

807. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 807 of the complaint and therefore deny them.

808. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 808 of the complaint and therefore deny them.

809. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 809 of the complaint and therefore deny them.

**7. Unnecessary Ultrasound Guidance in Connection with Trigger Point Injections**

810. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 810 of the complaint and therefore deny them.

811. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 811 of the complaint and therefore deny them.

812. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 812 of the complaint and therefore deny them.

813. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 813 of the complaint and therefore deny them.

814. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 814 of the complaint and therefore deny them.

815. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 815 of the complaint and therefore deny them.

816. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 816 of the complaint and therefore deny them.

817. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 817 of the complaint and therefore deny them.

818. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 818 of the complaint and therefore deny them.

**8. Specific Examples of Fraudulent Billing for Excessive and Medically Unnecessary Treatment**

**a. *Patient A.R. (claim no. 0502560626)***

819. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 819 of the complaint and therefore deny them.

820. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 820 of the complaint and therefore deny them.

821. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 821 of the complaint and therefore deny them.

822. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 822 of the complaint and therefore deny them.

823. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 823 of the complaint and therefore deny them.

824. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 824 of the complaint and therefore deny them.

825. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 825 of the complaint and therefore deny them.

826. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 826 of the complaint and therefore deny them.

827. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 827 of the complaint and therefore deny them.

828. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 828 of the complaint and therefore deny them.

829. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 829 of the complaint and therefore deny them.

830. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 830 of the complaint and therefore deny them.

831. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 831 of the complaint and therefore deny them.

832. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 832 of the complaint and therefore deny them.

833. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 833 of the complaint and therefore deny them.

834. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 834 of the complaint and therefore deny them.

835. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 835 of the complaint and therefore deny them.

836. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 836 of the complaint and therefore deny them.

837. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 837 of the complaint and therefore deny them.

838. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 838 of the complaint and therefore deny them.

839. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 839 of the complaint and therefore deny them.

840. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 840 of the complaint and therefore deny them.

841. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 841 of the complaint and therefore deny them.

842. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 842 of the complaint and therefore deny them.

843. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 843 of the complaint and therefore deny them.

844. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 844 of the complaint and therefore deny them.

845. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 845 of the complaint and therefore deny them.

846. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 846 of the complaint and therefore deny them.

847. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 847 of the complaint and therefore deny them.

848. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 848 of the complaint and therefore deny them.

849. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 849 of the complaint and therefore deny them.

850. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 850 of the complaint and therefore deny them.

851. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 851 of the complaint and therefore deny them.

852. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 852 of the complaint and therefore deny them.

853. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 853 of the complaint and therefore deny them.

854. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 854 of the complaint and therefore deny them.

**b. *Patient A.C. (claim no. 0471841072)***

855. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 855 of the complaint and therefore deny them.

856. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 856 of the complaint and therefore deny them.

857. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 857 of the complaint and therefore deny them.

858. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 858 of the complaint and therefore deny them.

859. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 859 of the complaint and therefore deny them.

860. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 860 of the complaint and therefore deny them.

861. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 861 of the complaint and therefore deny them.



862. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 862 of the complaint and therefore deny them.

863. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 863 of the complaint and therefore deny them.

864. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 864 of the complaint and therefore deny them.

865. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 865 of the complaint and therefore deny them.

866. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 866 of the complaint and therefore deny them.

867. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 867 of the complaint and therefore deny them.

868. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 868 of the complaint and therefore deny them.

869. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 869 of the complaint and therefore deny them.

870. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 870 of the complaint and therefore deny them.

871. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 871 of the complaint and therefore deny them.

872. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 872 of the complaint and therefore deny them.

873. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 873 of the complaint and therefore deny them.

874. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 874 of the complaint and therefore deny them.

875. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 875 of the complaint and therefore deny them.

876. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 876 of the complaint and therefore deny them.

877. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 877 of the complaint and therefore deny them.

878. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 878 of the complaint and therefore deny them.

879. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 879 of the complaint and therefore deny them.

880. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 880 of the complaint and therefore deny them.

881. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 881 of the complaint and therefore deny them.

882. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 882 of the complaint and therefore deny them.

883. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 883 of the complaint and therefore deny them.

884. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 884 of the complaint and therefore deny them.

885. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 885 of the complaint and therefore deny them.

**c. *Patient C.V. (claim no. 0538351263)***

886. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 886 of the complaint and therefore deny them.

887. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 887 of the complaint and therefore deny them.

888. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 888 of the complaint and therefore deny them.

889. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 889 of the complaint and therefore deny them.

890. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 890 of the complaint and therefore deny them.

891. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 891 of the complaint and therefore deny them.

892. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 892 of the complaint and therefore deny them.

893. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 893 of the complaint and therefore deny them.

894. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 894 of the complaint and therefore deny them.

895. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 895 of the complaint and therefore deny them.

896. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 896 of the complaint and therefore deny them.

897. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 897 of the complaint and therefore deny them.

898. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 898 of the complaint and therefore deny them.

899. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 899 of the complaint and therefore deny them.

900. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 900 of the complaint and therefore deny them.

901. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 901 of the complaint and therefore deny them.

902. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 902 of the complaint and therefore deny them.

903. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 903 of the complaint and therefore deny them.

904. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 904 of the complaint and therefore deny them.

905. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 905 of the complaint and therefore deny them.

906. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 906 of the complaint and therefore deny them.

907. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 907 of the complaint and therefore deny them.

908. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 908 of the complaint and therefore deny them.

909. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 909 of the complaint and therefore deny them.

910. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 910 of the complaint and therefore deny them.

911. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 911 of the complaint and therefore deny them.

912. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 912 of the complaint and therefore deny them.

913. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 913 of the complaint and therefore deny them.

914. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 914 of the complaint and therefore deny them.

915. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 915 of the complaint and therefore deny them.

916. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 916 of the complaint and therefore deny them.

917. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 917 of the complaint and therefore deny them.

918. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 918 of the complaint and therefore deny them.

919. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 919 of the complaint and therefore deny them.

**d.      *Patient D.M. (claim no. 0471841072)***

920.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 920 of the complaint and therefore deny them.

921.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 921 of the complaint and therefore deny them.

922.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 922 of the complaint and therefore deny them.

923.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 923 of the complaint and therefore deny them.

924.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 924 of the complaint and therefore deny them.

925.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 925 of the complaint and therefore deny them.

926.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 926 of the complaint and therefore deny them.

927.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 927 of the complaint and therefore deny them.

928.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 928 of the complaint and therefore deny them.

929.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 929 of the complaint and therefore deny them.

930.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 930 of the complaint and therefore deny them.

931. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 931 of the complaint and therefore deny them.

932. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 932 of the complaint and therefore deny them.

933. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 933 of the complaint and therefore deny them.

934. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 934 of the complaint and therefore deny them.

935. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 935 of the complaint and therefore deny them.

936. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 936 of the complaint and therefore deny them.

937. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 937 of the complaint and therefore deny them.

938. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 938 of the complaint and therefore deny them.

939. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 939 of the complaint and therefore deny them.

940. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 940 of the complaint and therefore deny them.

941. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 941 of the complaint and therefore deny them.

942. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 942 of the complaint and therefore deny them.

943. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 943 of the complaint and therefore deny them.

944. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 944 of the complaint and therefore deny them.

945. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 945 of the complaint and therefore deny them.

946. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 946 of the complaint and therefore deny them.

947. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 947 of the complaint and therefore deny them.

948. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 948 of the complaint and therefore deny them.

949. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 949 of the complaint and therefore deny them.

950. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 950 of the complaint and therefore deny them.

951. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 951 of the complaint and therefore deny them.

952. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 952 of the complaint and therefore deny them.

**e. *Patient G.W. (claim no. 0483594024)***

953. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 953 of the complaint and therefore deny them.



954. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 954 of the complaint and therefore deny them.

955. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 955 of the complaint and therefore deny them.

956. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 956 of the complaint and therefore deny them.

957. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 957 of the complaint and therefore deny them.

958. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 958 of the complaint and therefore deny them.

959. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 959 of the complaint and therefore deny them.

960. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 960 of the complaint and therefore deny them.

961. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 961 of the complaint and therefore deny them.

962. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 962 of the complaint and therefore deny them.

963. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 963 of the complaint and therefore deny them.

964. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 964 of the complaint and therefore deny them.

965. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 965 of the complaint and therefore deny them.

966. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 966 of the complaint and therefore deny them.

967. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 967 of the complaint and therefore deny them.

968. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 968 of the complaint and therefore deny them.

969. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 969 of the complaint and therefore deny them.

970. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 970 of the complaint and therefore deny them.

971. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 971 of the complaint and therefore deny them.

972. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 972 of the complaint and therefore deny them.

973. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 973 of the complaint and therefore deny them.

974. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 974 of the complaint and therefore deny them.

975. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 975 of the complaint and therefore deny them.

976. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 976 of the complaint and therefore deny them.

977. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 977 of the complaint and therefore deny them.

978. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 978 of the complaint and therefore deny them.

979. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 979 of the complaint and therefore deny them.

980. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 980 of the complaint and therefore deny them.

981. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 981 of the complaint and therefore deny them.

982. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 982 of the complaint and therefore deny them.

983. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 983 of the complaint and therefore deny them.

984. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 984 of the complaint and therefore deny them.

985. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 985 of the complaint and therefore deny them.

986. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 986 of the complaint and therefore deny them.

987. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 987 of the complaint and therefore deny them.

988. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 988 of the complaint and therefore deny them.

**f.        *Patient K.M. (claim no. 0525340410)***

989.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 989 of the complaint and therefore deny them.

990.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 990 of the complaint and therefore deny them.

991.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 991 of the complaint and therefore deny them.

992.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 992 of the complaint and therefore deny them.

993.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 993 of the complaint and therefore deny them.

994.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 994 of the complaint and therefore deny them.

995.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 995 of the complaint and therefore deny them.

996.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 996 of the complaint and therefore deny them.

997.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 997 of the complaint and therefore deny them.

998.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 998 of the complaint and therefore deny them.

999.    Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 999 of the complaint and therefore deny them.

1000. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1000 of the complaint and therefore deny them.

1001. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1001 of the complaint and therefore deny them.

1002. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1002 of the complaint and therefore deny them.

1003. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1003 of the complaint and therefore deny them.

1004. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1004 of the complaint and therefore deny them.

1005. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1005 of the complaint and therefore deny them.

1006. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1006 of the complaint and therefore deny them.

1007. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1007 of the complaint and therefore deny them.

1008. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1008 of the complaint and therefore deny them.

1009. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1009 of the complaint and therefore deny them.

1010. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1010 of the complaint and therefore deny them.

1011. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1011 of the complaint and therefore deny them.

1012. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1012 of the complaint and therefore deny them.

1013. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1013 of the complaint and therefore deny them.

1014. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1014 of the complaint and therefore deny them.

1015. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1015 of the complaint and therefore deny them.

1016. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1016 of the complaint and therefore deny them.

1017. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1017 of the complaint and therefore deny them.

**g.      *Patient K.S. (claim no. 0478611791)***

1018. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1018 of the complaint and therefore deny them.

1019. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1019 of the complaint and therefore deny them.

1020. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1020 of the complaint and therefore deny them.

1021. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1021 of the complaint and therefore deny them.

1022. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1022 of the complaint and therefore deny them.

1023. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1023 of the complaint and therefore deny them.

1024. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1024 of the complaint and therefore deny them.

1025. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1025 of the complaint and therefore deny them.

1026. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1026 of the complaint and therefore deny them.

1027. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1027 of the complaint and therefore deny them.

1028. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1028 of the complaint and therefore deny them.

1029. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1029 of the complaint and therefore deny them.

1030. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1030 of the complaint and therefore deny them.

1031. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1031 of the complaint and therefore deny them.

1032. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1032 of the complaint and therefore deny them.

1033. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1033 of the complaint and therefore deny them.

1034. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1034 of the complaint and therefore deny them.

1035. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1035 of the complaint and therefore deny them.

1036. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1036 of the complaint and therefore deny them.

1037. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1037 of the complaint and therefore deny them.

1038. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1038 of the complaint and therefore deny them.

1039. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1039 of the complaint and therefore deny them.

1040. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1040 of the complaint and therefore deny them.

1041. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1041 of the complaint and therefore deny them.

1042. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1042 of the complaint and therefore deny them.

1043. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1043 of the complaint and therefore deny them.

1044. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1044 of the complaint and therefore deny them.

1045. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1045 of the complaint and therefore deny them.



1046. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1046 of the complaint and therefore deny them.

1047. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1047 of the complaint and therefore deny them.

1048. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1048 of the complaint and therefore deny them.

**h.      *Patient M.K. (claim no. 0550915888)***

1049. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1049 of the complaint and therefore deny them.

1050. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1050 of the complaint and therefore deny them.

1051. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1051 of the complaint and therefore deny them.

1052. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1052 of the complaint and therefore deny them.

1053. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1053 of the complaint and therefore deny them.

1054. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1054 of the complaint and therefore deny them.

1055. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1055 of the complaint and therefore deny them.

1056. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1056 of the complaint and therefore deny them.

1057. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1057 of the complaint and therefore deny them.

1058. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1058 of the complaint and therefore deny them.

1059. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1059 of the complaint and therefore deny them.

1060. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1060 of the complaint and therefore deny them.

1061. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1061 of the complaint and therefore deny them.

1062. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1062 of the complaint and therefore deny them.

1063. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1063 of the complaint and therefore deny them.

1064. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1064 of the complaint and therefore deny them.

1065. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1065 of the complaint and therefore deny them.

1066. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1066 of the complaint and therefore deny them.

1067. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1067 of the complaint and therefore deny them.

1068. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1068 of the complaint and therefore deny them.

1069. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1069 of the complaint and therefore deny them.

1070. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1070 of the complaint and therefore deny them.

1071. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1071 of the complaint and therefore deny them.

1072. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1072 of the complaint and therefore deny them.

1073. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1073 of the complaint and therefore deny them.

1074. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1074 of the complaint and therefore deny them.

1075. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1075 of the complaint and therefore deny them.

1076. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1076 of the complaint and therefore deny them.

1077. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1077 of the complaint and therefore deny them.

1078. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1078 of the complaint and therefore deny them.

1079. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1079 of the complaint and therefore deny them.

1080. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1080 of the complaint and therefore deny them.

1081. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1081 of the complaint and therefore deny them.

1082. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1082 of the complaint and therefore deny them.

1083. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1083 of the complaint and therefore deny them.

**i.        *Patient R.S. (claim no. 0493041115)***

1084. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1084 of the complaint and therefore deny them.

1085. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1085 of the complaint and therefore deny them.

1086. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1086 of the complaint and therefore deny them.

1087. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1087 of the complaint and therefore deny them.

1088. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1088 of the complaint and therefore deny them.

1089. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1089 of the complaint and therefore deny them.

1090. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1090 of the complaint and therefore deny them.

1091. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1091 of the complaint and therefore deny them.

1092. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1092 of the complaint and therefore deny them.

1093. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1093 of the complaint and therefore deny them.

1094. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1094 of the complaint and therefore deny them.

1095. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1095 of the complaint and therefore deny them.

1096. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1096 of the complaint and therefore deny them.

1097. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1097 of the complaint and therefore deny them.

1098. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1098 of the complaint and therefore deny them.

1099. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1099 of the complaint and therefore deny them.

1100. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1100 of the complaint and therefore deny them.

1101. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1101 of the complaint and therefore deny them.

1102. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1102 of the complaint and therefore deny them.

1103. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1103 of the complaint and therefore deny them.

1104. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1104 of the complaint and therefore deny them.

1105. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1105 of the complaint and therefore deny them.

1106. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1106 of the complaint and therefore deny them.

1107. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1107 of the complaint and therefore deny them.

1108. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1108 of the complaint and therefore deny them.

1109. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1109 of the complaint and therefore deny them.

1110. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1110 of the complaint and therefore deny them.

1111. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1111 of the complaint and therefore deny them.

1112. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1112 of the complaint and therefore deny them.

**j.        *Patient N.G. (claim no. 0513708818)***

1113. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1113 of the complaint and therefore deny them.

1114. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1114 of the complaint and therefore deny them.

1115. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1115 of the complaint and therefore deny them.

1116. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1116 of the complaint and therefore deny them.

1117. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1117 of the complaint and therefore deny them.

1118. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1118 of the complaint and therefore deny them.

1119. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1119 of the complaint and therefore deny them.

1120. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1120 of the complaint and therefore deny them.

1121. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1121 of the complaint and therefore deny them.

1122. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1122 of the complaint and therefore deny them.

1123. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1123 of the complaint and therefore deny them.

1124. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1124 of the complaint and therefore deny them.

1125. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1125 of the complaint and therefore deny them.

1126. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1126 of the complaint and therefore deny them.

1127. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1127 of the complaint and therefore deny them.

1128. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1128 of the complaint and therefore deny them.

1129. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1129 of the complaint and therefore deny them.

1130. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1130 of the complaint and therefore deny them.

1131. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1131 of the complaint and therefore deny them.

1132. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1132 of the complaint and therefore deny them.

1133. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1133 of the complaint and therefore deny them.

1134. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1134 of the complaint and therefore deny them.

1135. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1135 of the complaint and therefore deny them.

1136. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1136 of the complaint and therefore deny them.

1137. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1137 of the complaint and therefore deny them.



1138. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1138 of the complaint and therefore deny them.

1139. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1139 of the complaint and therefore deny them.

1140. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1140 of the complaint and therefore deny them.

1141. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1141 of the complaint and therefore deny them.

1142. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1142 of the complaint and therefore deny them.

1143. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1143 of the complaint and therefore deny them.

1144. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1144 of the complaint and therefore deny them.

1145. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1145 of the complaint and therefore deny them.

1146. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1146 of the complaint and therefore deny them.

1147. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1147 of the complaint and therefore deny them.

1148. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1148 of the complaint and therefore deny them.

1149. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1149 of the complaint and therefore deny them.

1150. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1150 of the complaint and therefore deny them.

**k.      *Patient O.V. (claim no. 0452273386)***

1151. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1151 of the complaint and therefore deny them.

1152. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1152 of the complaint and therefore deny them.

1153. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1153 of the complaint and therefore deny them.

1154. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1154 of the complaint and therefore deny them.

1155. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1155 of the complaint and therefore deny them.

1156. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1156 of the complaint and therefore deny them.

1157. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1157 of the complaint and therefore deny them.

1158. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1158 of the complaint and therefore deny them.

1159. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1159 of the complaint and therefore deny them.

1160. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1160 of the complaint and therefore deny them.

1161. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1161 of the complaint and therefore deny them.

1162. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1162 of the complaint and therefore deny them.

1163. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1163 of the complaint and therefore deny them.

1164. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1164 of the complaint and therefore deny them.

1165. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1165 of the complaint and therefore deny them.

1166. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1166 of the complaint and therefore deny them.

1167. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1167 of the complaint and therefore deny them.

1168. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1168 of the complaint and therefore deny them.

1169. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1169 of the complaint and therefore deny them.

1170. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1170 of the complaint and therefore deny them.

1171. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1171 of the complaint and therefore deny them.

1172. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1172 of the complaint and therefore deny them.

1173. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1173 of the complaint and therefore deny them.

**I. Patient O.F. (claim no. 0553018490)**

1174. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1174 of the complaint and therefore deny them.

1175. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1175 of the complaint and therefore deny them.

1176. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1176 of the complaint and therefore deny them.

1177. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1177 of the complaint and therefore deny them.

1178. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1178 of the complaint and therefore deny them.

1179. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1179 of the complaint and therefore deny them.

1180. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1180 of the complaint and therefore deny them.

1181. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1181 of the complaint and therefore deny them.

1182. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1182 of the complaint and therefore deny them.

1183. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1183 of the complaint and therefore deny them.

1184. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1184 of the complaint and therefore deny them.

1185. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1185 of the complaint and therefore deny them.

1186. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1186 of the complaint and therefore deny them.

1187. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1187 of the complaint and therefore deny them.

1188. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1188 of the complaint and therefore deny them.

1189. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1189 of the complaint and therefore deny them.

1190. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1190 of the complaint and therefore deny them.

1191. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1191 of the complaint and therefore deny them.

1192. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1192 of the complaint and therefore deny them.

1193. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1193 of the complaint and therefore deny them.

1194. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1194 of the complaint and therefore deny them.

1195. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1195 of the complaint and therefore deny them.

1196. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1196 of the complaint and therefore deny them.

1197. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1197 of the complaint and therefore deny them.

1198. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1198 of the complaint and therefore deny them.

1199. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1199 of the complaint and therefore deny them.

1200. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1200 of the complaint and therefore deny them.

1201. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1201 of the complaint and therefore deny them.

1202. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1202 of the complaint and therefore deny them.

1203. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1203 of the complaint and therefore deny them.

1204. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1204 of the complaint and therefore deny them.

1205. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1205 of the complaint and therefore deny them.

1206. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1206 of the complaint and therefore deny them.

1207. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1207 of the complaint and therefore deny them.

1208. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1208 of the complaint and therefore deny them.

1209. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1209 of the complaint and therefore deny them.

1210. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1210 of the complaint and therefore deny them.

1211. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1211 of the complaint and therefore deny them.

1212. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1212 of the complaint and therefore deny them.

1213. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1213 of the complaint and therefore deny them.

**m.      *Patient P.A. (claim no. 0488490319)***

1214. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1214 of the complaint and therefore deny them.

1215. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1215 of the complaint and therefore deny them.

1216. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1216 of the complaint and therefore deny them.

1217. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1217 of the complaint and therefore deny them.

1218. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1218 of the complaint and therefore deny them.

1219. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1219 of the complaint and therefore deny them.

1220. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1220 of the complaint and therefore deny them.

1221. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1221 of the complaint and therefore deny them.

1222. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1222 of the complaint and therefore deny them.

1223. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1223 of the complaint and therefore deny them.

1224. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1224 of the complaint and therefore deny them.

1225. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1225 of the complaint and therefore deny them.

1226. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1226 of the complaint and therefore deny them.

1227. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1227 of the complaint and therefore deny them.

1228. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1228 of the complaint and therefore deny them.

1229. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1229 of the complaint and therefore deny them.



1230. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1230 of the complaint and therefore deny them.

1231. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1231 of the complaint and therefore deny them.

1232. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1232 of the complaint and therefore deny them.

1233. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1233 of the complaint and therefore deny them.

1234. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1234 of the complaint and therefore deny them.

1235. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1235 of the complaint and therefore deny them.

1236. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1236 of the complaint and therefore deny them.

1237. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1237 of the complaint and therefore deny them.

1238. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1238 of the complaint and therefore deny them.

1239. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1239 of the complaint and therefore deny them.

1240. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1240 of the complaint and therefore deny them.

1241. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1241 of the complaint and therefore deny them.

1242. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1242 of the complaint and therefore deny them.

1243. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1243 of the complaint and therefore deny them.

1244. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1244 of the complaint and therefore deny them.

1245. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1245 of the complaint and therefore deny them.

**n.      *Patient R.M. (claim no. 0545111825)***

1246. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1246 of the complaint and therefore deny them.

1247. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1247 of the complaint and therefore deny them.

1248. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1248 of the complaint and therefore deny them.

1249. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1249 of the complaint and therefore deny them.

1250. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1250 of the complaint and therefore deny them.

1251. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1251 of the complaint and therefore deny them.

1252. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1252 of the complaint and therefore deny them.

1253. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1253 of the complaint and therefore deny them.

1254. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1254 of the complaint and therefore deny them.

1255. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1255 of the complaint and therefore deny them.

1256. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1256 of the complaint and therefore deny them.

1257. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1257 of the complaint and therefore deny them.

1258. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1258 of the complaint and therefore deny them.

1259. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1259 of the complaint and therefore deny them.

1260. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1260 of the complaint and therefore deny them.

1261. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1261 of the complaint and therefore deny them.

1262. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1262 of the complaint and therefore deny them.

1263. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1263 of the complaint and therefore deny them.

1264. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1264 of the complaint and therefore deny them.

1265. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1265 of the complaint and therefore deny them.

1266. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1266 of the complaint and therefore deny them.

1267. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1267 of the complaint and therefore deny them.

1268. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1268 of the complaint and therefore deny them.

1269. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1269 of the complaint and therefore deny them.

1270. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1270 of the complaint and therefore deny them.

1271. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1271 of the complaint and therefore deny them.

1272. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1272 of the complaint and therefore deny them.

1273. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1273 of the complaint and therefore deny them.

1274. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1274 of the complaint and therefore deny them.

1275. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1275 of the complaint and therefore deny them.

1276. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1276 of the complaint and therefore deny them.

1277. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1277 of the complaint and therefore deny them.

1278. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1278 of the complaint and therefore deny them.

1279. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1279 of the complaint and therefore deny them.

1280. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1280 of the complaint and therefore deny them.

**VI. SPECIFIC ALLEGATIONS OF MAIL FRAUD RACKETEERING ACTIVITY**

1281. Defendants deny the allegations of paragraph 1281 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1282. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1282 of the complaint and therefore deny them.

1283. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1283 of the complaint and therefore deny them.

1284. Defendants deny the allegations of paragraph 1284 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**A. EPIONE ENTERPRISE**

1285. Defendants deny the allegations of paragraph 1285 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1286. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1286 of the complaint and therefore deny them.

1287. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1287 of the complaint and therefore deny them.

1288. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1288 of the complaint and therefore deny them.

1289. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1289 of the complaint and therefore deny them.

1290. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1290 of the complaint and therefore deny them.

**B. APAK ENTERPRISE**

1291. Defendants deny the allegations of paragraph 1291 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1292. Defendants deny the allegations of paragraph 1292 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1293. Defendants deny the allegations of paragraph 1293 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1294. Defendants deny the allegations of paragraph 1294 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1295. Defendants deny the allegations of paragraph 1295 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1296. Defendants deny the allegations of paragraph 1296 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**C. WELLMART ENTERPRISE**

1297. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1297 of the complaint and therefore deny them.

1298. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1298 of the complaint and therefore deny them.

1299. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1299 of the complaint and therefore deny them.

1300. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1300 of the complaint and therefore deny them.

1301. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1301 of the complaint and therefore deny them.

1302. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1302 of the complaint and therefore deny them.

1303. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1303 of the complaint and therefore deny them.

1304. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1304 of the complaint and therefore deny them.

1305. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1305 of the complaint and therefore deny them.

1306. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1306 of the complaint and therefore deny them.

1307. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1307 of the complaint and therefore deny them.

**D. IBS ENTERPRISE**

1308. Defendants deny the allegations of paragraph 1308 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1309. Defendants deny the allegations of paragraph 1309 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1310. Defendants deny the allegations of paragraph 1310 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1311. Defendants deny the allegations of paragraph 1311 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1312. Defendants deny the allegations of paragraph 1312 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth



of the remaining allegations of that paragraph and therefore deny them.

1313. Defendants deny the allegations of paragraph 1313 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1314. Defendants deny the allegations of paragraph 1314 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1315. Defendants deny the allegations of paragraph 1315 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1316. Defendants deny the allegations of paragraph 1316 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**E. BILLING PROS ENTERPRISE**

1317. Defendants deny the allegations of paragraph 1317 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1318. Defendants deny the allegations of paragraph 1318 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1319. Defendants deny the allegations of paragraph 1319 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1320. Defendants deny the allegations of paragraph 1320 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1321. Defendants deny the allegations of paragraph 1321 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1322. Defendants deny the allegations of paragraph 1322 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1323. Defendants deny the allegations of paragraph 1323 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1324. Defendants deny the allegations of paragraph 1324 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1325. Defendants deny the allegations of paragraph 1325 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**F. PRACTICE WIZ ENTERPRISE**

1326. Defendants deny the allegations of paragraph 1326 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1327. Defendants deny the allegations of paragraph 1327 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1328. Defendants deny the allegations of paragraph 1328 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1329. Defendants deny the allegations of paragraph 1329 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1330. Defendants deny the allegations of paragraph 1330 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1331. Defendants deny the allegations of paragraph 1331 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1332. Defendants deny the allegations of paragraph 1332 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1333. Defendants deny the allegations of paragraph 1333 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1334. Defendants deny the allegations of paragraph 1334 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**VII. SPECIFIC ALLEGATIONS OF FRAUDULENT CONCEALMENT AND MATERIAL MISREPRESENTATIONS MADE TO AND RELIED UPON BY ALLSTATE**

**A. THE EPIONE AND APAK ENTERPRISES**

1335. Defendants admit the allegations of paragraph 1335 of the complaint that Mostovoy is registered with the State of New York as the sole officer, director, and shareholder of APAK, but lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1336. Defendants deny the allegations of paragraph 1336 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1337. Defendants deny the allegations of paragraph 1337 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1338. Defendants deny the allegations of paragraph 1338 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1339. Defendants deny the allegations of paragraph 1339 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1340. Defendants deny the allegations of paragraph 1340 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1341. Defendants deny the allegations of paragraph 1341 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

1342. Defendants deny the allegations of paragraph 1342 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1343. Defendants deny the allegations of paragraph 1343 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1344. Defendants deny the allegations of paragraph 1344 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1345. Defendants deny the allegations of paragraph 1345 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1346. Defendants deny the allegations of paragraph 1346 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1347. Defendants deny the allegations of paragraph 1347 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1348. Defendants deny the allegations of paragraph 1348 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1349. Defendants deny the allegations of paragraph 1349 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1350. Defendants deny the allegations of paragraph 1350 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1351. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1351 of the complaint and therefore deny them.

1352. Defendants deny the allegations of paragraph 1352 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1353. Defendants deny the allegations of paragraph 1353 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1354. Defendants deny the allegations of paragraph 1354 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1355. Defendants deny the allegations of paragraph 1355 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1356. Defendants deny the allegations of paragraph 1356 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1357. Defendants deny the allegations of paragraph 1357 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1358. Defendants deny the allegations of paragraph 1358 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1359. Paragraph 1359 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

1360. Defendants deny the allegations of paragraph 1360 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1361. Defendants deny the allegations of paragraph 1361 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**B. THE WELLMART ENTERPRISE**

1362. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1362 of the complaint and therefore deny them.

1363. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1363 of the complaint and therefore deny them.

1364. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1364 of the complaint and therefore deny them.

1365. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1365 of the complaint and therefore deny them.

1366. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1366 of the complaint and therefore deny them.

1367. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1367 of the complaint and therefore deny them.

1368. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1368 of the complaint and therefore deny them.

1369. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1369 of the complaint and therefore deny them.

1370. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1370 of the complaint and therefore deny them.

1371. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1371 of the complaint and therefore deny them.

1372. Paragraph 1372 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

1373. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1373 of the complaint and therefore deny them.

1374. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1374 of the complaint and therefore deny them.

**C. THE MANAGEMENT COMPANY ENTERPRISES**

1375. Defendants deny the allegations of paragraph 1375 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1376. Defendants deny the allegations of paragraph 1376 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1377. Defendants deny the allegations of paragraph 1377 of the complaint with respect to



APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1378. Defendants deny the allegations of paragraph 1378 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1379. Defendants deny the allegations of paragraph 1379 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1380. Defendants deny the allegations of paragraph 1380 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1381. Defendants deny the allegations of paragraph 1381 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1382. Defendants deny the allegations of paragraph 1382 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1383. Defendants deny the allegations of paragraph 1383 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1384. Defendants deny the allegations of paragraph 1384 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1385. Defendants deny the allegations of paragraph 1385 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1386. Paragraph 1386 of the complaint is a purported statement of law, and not an allegation of fact, and as such, no response is required.

1387. Defendants deny the allegations of paragraph 1387 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1388. Defendants deny the allegations of paragraph 1388 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

#### **VIII. ALLSTATE'S JUSTIFIABLE RELIANCE**

1389. Defendants admit the allegations of paragraph 1389 of the complaint.

1390. Defendants admit the allegations of paragraph 1390 of the complaint.

1391. Defendants deny the allegations of paragraph 1391 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1392. Defendants deny the allegations of paragraph 1392 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1393. Defendants deny the allegations of paragraph 1393 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1394. Defendants deny the allegations of paragraph 1394 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1395. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1395 of the complaint and therefore deny them.

1396. Defendants deny the allegations of paragraph 1396 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1397. Defendants deny the allegations of paragraph 1397 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

#### **VIII. DAMAGES**

1398. Defendants deny the allegations of paragraph 1398 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

#### **IX. CAUSES OF ACTION**

##### **COUNT I**

##### **VIOLATIONS OF 18 U.S.C. § 1962(c)**

##### **EPIONE MEDICAL, P.C. ENTERPRISE**

**(Against Michael Y. Jacobi, D.O., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Stella Raytsin, Elena Mumin-Akhunov, Innovative Business Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1399. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1400. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1400 of the complaint and therefore deny them.

1401. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1401 of the complaint and therefore deny them.

1402. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1402 of the complaint and therefore deny them.

1403. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1403 of the complaint and therefore deny them.

1404. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1404 of the complaint and therefore deny them.

1405. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1405 of the complaint and therefore deny them.

1406. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1406 of the complaint and therefore deny them.

1407. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1407 of the complaint and therefore deny them.

1408. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1408 of the complaint and therefore deny them.

1409. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1409 of the complaint and therefore deny them.

1410. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1410 of the complaint and therefore deny them.

1411. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1411 of the complaint and therefore deny them.

1412. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1412 of the complaint and therefore deny them.

1413. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1413 of the complaint and therefore deny them.

1414. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1414 of the complaint and therefore deny them.

1415. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1415 of the complaint and therefore deny them.

1416. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1416 of the complaint and therefore deny them.

**COUNT II**  
**VIOLATIONS OF 18 U.S.C. § 1962(D)**  
**EPIONE MEDICAL, P.C. ENTERPRISE**  
**(Against Michael Y. Jacobi, D.O., Simon Davydov, Emanuel David a/k/a Emanuel Davydov**  
**a/k/a Emik Davydov, Stella Raytsin, Elena Mumin-Akhunov, Innovative Business**  
**Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1417. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1418. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1418 of the complaint and therefore deny them.

1419. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1419 of the complaint and therefore deny them.

1420. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1420 of the complaint and therefore deny them.

1421. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1421 of the complaint and therefore deny them.

1422. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1422 of the complaint and therefore deny them.

1423. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1423 of the complaint and therefore deny them.

1424. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1424 of the complaint and therefore deny them.

**COUNT III**  
**VIOLATIONS OF 18 U.S.C. § 1962(C)**  
**APAK CHIROPRACTIC, P.C. ENTERPRISE**  
**(Against Aleksandr Mostovoy, D.C., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Elena Mumin-Akhunov, Stella Raytsin, Practice Wiz, Inc., Innovative Business Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1425. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1426. Defendants deny the allegations of paragraph 1426 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1427. Defendants deny the allegations of paragraph 1427 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1428. Defendants deny the allegations of paragraph 1428 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1429. Defendants deny the allegations of paragraph 1429 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1430. Defendants deny the allegations of paragraph 1430 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

1431. Defendants deny the allegations of paragraph 1431 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1432. Defendants deny the allegations of paragraph 1432 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1433. Defendants deny the allegations of paragraph 1433 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1434. Defendants deny the allegations of paragraph 1434 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1435. Defendants deny the allegations of paragraph 1435 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1436. Defendants deny the allegations of paragraph 1436 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1437. Defendants deny the allegations of paragraph 1437 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1438. Defendants deny the allegations of paragraph 1438 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1439. Defendants deny the allegations of paragraph 1439 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1440. Defendants deny the allegations of paragraph 1440 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1441. Defendants deny the allegations of paragraph 1441 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1442. Defendants deny the allegations of paragraph 1442 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT IV**  
**VIOLATIONS OF 18 U.S.C. § 1962(d)**  
**APAK CHIROPRACTIC, P.C. ENTERPRISE**  
**(Against Aleksandr Mostovoy, D.C., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Elena Mumin-Akhunov, Stella Raytsin, Practice Wiz, Inc., Innovative Business Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1443. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1444. Defendants deny the allegations of paragraph 1444 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1445. Defendants deny the allegations of paragraph 1445 of the complaint with respect to



APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1446. Defendants deny the allegations of paragraph 1446 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1447. Defendants deny the allegations of paragraph 1447 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1448. Defendants deny the allegations of paragraph 1448 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1449. Defendants deny the allegations of paragraph 1449 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1450. Defendants deny the allegations of paragraph 1450 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT V**  
**VIOLATIONS OF 18 U.S.C. § 1962(c)**  
**WELLMART RX, INC. ENTERPRISE**  
**(Against Simon Davydov, Ruslan Nektalov a/k/a Russ Nekta, Michael Y. Jacobi,**  
**D.O., and Epione Medical, P.C.)**

1451. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1452. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1452 of the complaint and therefore deny them.

1453. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1453 of the complaint and therefore deny them.

1454. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1454 of the complaint and therefore deny them.

1455. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1455 of the complaint and therefore deny them.

1456. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1456 of the complaint and therefore deny them.

1457. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1457 of the complaint and therefore deny them.

1458. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1458 of the complaint and therefore deny them.

1459. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1459 of the complaint and therefore deny them.

1460. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1460 of the complaint and therefore deny them.

1461. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1461 of the complaint and therefore deny them.

1462. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1462 of the complaint and therefore deny them.

1463. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1463 of the complaint and therefore deny them.

1464. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1464 of the complaint and therefore deny them.

1465. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1465 of the complaint and therefore deny them.

1466. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1466 of the complaint and therefore deny them.

1467. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1467 of the complaint and therefore deny them.

**COUNT VI**  
**VIOLATIONS OF 18 U.S.C. § 1962(d)**  
**WELLMART RX, INC. ENTERPRISE**  
**(Against Simon Davydov, Ruslan Nektalov a/k/a Russ Nekta, Michael Y. Jacobi, D.O.,**  
**and Epione Medical, P.C.)**

1468. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1469. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1469 of the complaint and therefore deny them.

1470. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1470 of the complaint and therefore deny them.

1471. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1471 of the complaint and therefore deny them.

1472. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1472 of the complaint and therefore deny them.

1473. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1473 of the complaint and therefore deny them.

1474. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1474 of the complaint and therefore deny them.

**COUNT VII**  
**VIOLATIONS OF 18 U.S.C. § 1962(c)**  
**PRACTICE WIZ, INC. ENTERPRISE**  
**(Against APAK Chiropractic, P.C., Aleksandr Mostovoy, D.C., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Stella Raytsin, and Elena Mumin-Akhunov)**

1475. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1476. Defendants deny the allegations of paragraph 1476 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1477. Defendants deny the allegations of paragraph 1477 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1478. Defendants deny the allegations of paragraph 1478 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1479. Defendants deny the allegations of paragraph 1479 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1480. Defendants deny the allegations of paragraph 1480 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1481. Defendants deny the allegations of paragraph 1481 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1482. Defendants deny the allegations of paragraph 1482 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1483. Defendants deny the allegations of paragraph 1483 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1484. Defendants deny the allegations of paragraph 1484 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1485. Defendants deny the allegations of paragraph 1485 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1486. Defendants deny the allegations of paragraph 1486 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1487. Defendants deny the allegations of paragraph 1487 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1488. Defendants deny the allegations of paragraph 1488 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1489. Defendants deny the allegations of paragraph 1489 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

1490. Defendants deny the allegations of paragraph 1490 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1491. Defendants deny the allegations of paragraph 1491 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1492. Defendants deny the allegations of paragraph 1492 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1493. Defendants deny the allegations of paragraph 1493 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1494. Defendants deny the allegations of paragraph 1494 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1495. Defendants deny the allegations of paragraph 1495 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1496. Defendants deny the allegations of paragraph 1496 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1497. Defendants deny the allegations of paragraph 1497 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT VIII**  
**VIOLATIONS OF 18 U.S.C. § 1962(d)**  
**PRACTICE WIZ, INC. ENTERPRISE**  
**(Against APAK Chiropractic, P.C., Aleksandr Mostovoy, D.C., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Stella Raytsin, and Elena Mumin-Akhunov)**

1498. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1499. Defendants deny the allegations of paragraph 1499 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1500. Defendants deny the allegations of paragraph 1500 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1501. Defendants deny the allegations of paragraph 1501 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1502. Defendants deny the allegations of paragraph 1502 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1503. Defendants deny the allegations of paragraph 1503 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1504. Defendants deny the allegations of paragraph 1504 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1505. Defendants deny the allegations of paragraph 1505 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1506. Defendants deny the allegations of paragraph 1506 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT IX**  
**VIOLATIONS OF 18 U.S.C. § 1962(c)**  
**MBCC SUPPORT LTD. D/B/A BILLING PROS ENTERPRISE**  
**(Against Epione Medical, P.C., APAK Chiropractic, P.C., Michael Y. Jacobi, D.O.,**  
**Aleksandr Mostovoy, D.C., Elena Mumin-Akhunov, Simon Davydov, Stella Raytsin, and**  
**Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov)**

1507. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1508. Defendants deny the allegations of paragraph 1508 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1509. Defendants deny the allegations of paragraph 1509 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1510. Defendants deny the allegations of paragraph 1510 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1511. Defendants deny the allegations of paragraph 1511 of the complaint with respect to



APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1512. Defendants deny the allegations of paragraph 1512 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1513. Defendants deny the allegations of paragraph 1513 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1514. Defendants deny the allegations of paragraph 1514 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1515. Defendants deny the allegations of paragraph 1515 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1516. Defendants deny the allegations of paragraph 1516 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1517. Defendants deny the allegations of paragraph 1517 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1518. Defendants deny the allegations of paragraph 1518 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1519. Defendants deny the allegations of paragraph 1519 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1520. Defendants deny the allegations of paragraph 1520 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1521. Defendants deny the allegations of paragraph 1521 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1522. Defendants deny the allegations of paragraph 1522 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1523. Defendants deny the allegations of paragraph 1523 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1524. Defendants deny the allegations of paragraph 1524 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1525. Defendants deny the allegations of paragraph 1525 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1526. Defendants deny the allegations of paragraph 1526 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

1527. Defendants deny the allegations of paragraph 1527 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1528. Defendants deny the allegations of paragraph 1528 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1529. Defendants deny the allegations of paragraph 1529 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT X**  
**VIOLATIONS OF 18 U.S.C. § 1962(d)**  
**MBCC SUPPORT LTD. D/B/A BILLING PROS ENTERPRISE**  
**(Against Epione Medical, P.C., APAK Chiropractic, P.C., Michael Y. Jacobi, D.O.,**  
**Aleksandr Mostovoy, D.C., Elena Mumin-Akhunov, Simon Davydov, Stella Raytsin, and**  
**Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov)**

1530. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1531. Defendants deny the allegations of paragraph 1531 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1532. Defendants deny the allegations of paragraph 1532 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1533. Defendants deny the allegations of paragraph 1533 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

1534. Defendants deny the allegations of paragraph 1534 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1535. Defendants deny the allegations of paragraph 1535 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1536. Defendants deny the allegations of paragraph 1536 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1537. Defendants deny the allegations of paragraph 1537 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1538. Defendants deny the allegations of paragraph 1538 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT XI**  
**VIOLATIONS OF 18 U.S.C. § 1962(c)**  
**INNOVATIVE BUSINESS STRATEGIES, INC. ENTERPRISE**  
**(Against Epione Medical, P.C., APAK Chiropractic, P.C., Michael Y. Jacobi, D.O.,**  
**Aleksandr Mostovoy, D.C., Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov,**  
**Simon Davydov, Stella Raytsin, and Elena Mumin-Akhunov)**

1539. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1540. Defendants deny the allegations of paragraph 1540 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

1541. Defendants deny the allegations of paragraph 1541 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1542. Defendants deny the allegations of paragraph 1542 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1543. Defendants deny the allegations of paragraph 1543 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1544. Defendants deny the allegations of paragraph 1544 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1545. Defendants deny the allegations of paragraph 1545 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1546. Defendants deny the allegations of paragraph 1546 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1547. Defendants deny the allegations of paragraph 1547 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1548. Defendants deny the allegations of paragraph 1548 of the complaint with respect to

APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1549. Defendants deny the allegations of paragraph 1549 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1550. Defendants deny the allegations of paragraph 1550 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1551. Defendants deny the allegations of paragraph 1551 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1552. Defendants deny the allegations of paragraph 1552 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1553. Defendants deny the allegations of paragraph 1553 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1554. Defendants deny the allegations of paragraph 1554 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1555. Defendants deny the allegations of paragraph 1555 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1556. Defendants deny the allegations of paragraph 1556 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1557. Defendants deny the allegations of paragraph 1557 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1558. Defendants deny the allegations of paragraph 1558 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1559. Defendants deny the allegations of paragraph 1559 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1560. Defendants deny the allegations of paragraph 1560 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1561. Defendants deny the allegations of paragraph 1561 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT XII**  
**VIOLATIONS OF 18 U.S.C. § 1962(d)**  
**INNOVATIVE BUSINESS STRATEGIES, INC. ENTERPRISE**  
**(Against Epione Medical, P.C., APAK Chiropractic, P.C., Michael Y. Jacobi, D.O.,**  
**Aleksandr Mostovoy, D.C., Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov,**  
**Simon Davydov, Stella Raytsin, and Elena Mumin-Akhunov)**

1562. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1563. Defendants deny the allegations of paragraph 1563 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1564. Defendants deny the allegations of paragraph 1564 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1565. Defendants deny the allegations of paragraph 1565 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1566. Defendants deny the allegations of paragraph 1566 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1567. Defendants deny the allegations of paragraph 1567 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1568. Defendants deny the allegations of paragraph 1568 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1569. Defendants deny the allegations of paragraph 1569 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1570. Defendants deny the allegations of paragraph 1570 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth



of the remaining allegations of that paragraph and therefore deny them.

**COUNT XIII**  
**COMMON LAW FRAUD**

**(Against Epione Medical, P.C., Michael Y. Jacobi, D.O., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Stella Raytsin, Elena Mumin-Akhunov, Innovative Business Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1571. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1572. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1572 of the complaint and therefore deny them.

1573. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1573 of the complaint and therefore deny them.

1574. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1574 of the complaint and therefore deny them.

1575. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1575 of the complaint and therefore deny them.

1576. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1576 of the complaint and therefore deny them.

**COUNT XIV**  
**COMMON LAW FRAUD**

**(Against APAK Chiropractic, P.C., Aleksandr Mostovoy, D.C., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Stella Raytsin, Elena Mumin-Akhunov, Practice Wiz, Inc., Innovative Business Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1577. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1578. Defendants deny the allegations of paragraph 1578 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth

of the remaining allegations of that paragraph and therefore deny them.

1579. Defendants deny the allegations of paragraph 1579 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1580. Defendants deny the allegations of paragraph 1580 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1581. Defendants deny the allegations of paragraph 1581 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1582. Defendants deny the allegations of paragraph 1582 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT XV**  
**COMMON LAW FRAUD**  
**(Against Wellmart Rx, Inc., Simon Davydov, Ruslan Nektalov a/k/a Russ Nekta,**  
**Michael Y. Jacobi, D.O., and Epione Medical, P.C.)**

1583. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1584. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1584 of the complaint and therefore deny them.

1585. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1585 of the complaint and therefore deny them.

1586. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1586 of the complaint and therefore deny them.

1587. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1587 of the complaint and therefore deny them.

1588. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1588 of the complaint and therefore deny them.

**COUNT XVI**  
**UNJUST ENRICHMENT**

**(Against Epione Medical, P.C., Michael Y. Jacobi, D.O., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Stella Raytsin, Elena Mumin-Akhunov, Innovative Business Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1589. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1590. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1590 of the complaint and therefore deny them.

1591. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1591 of the complaint and therefore deny them.

1592. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1592 of the complaint and therefore deny them.

1593. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1593 of the complaint and therefore deny them.

1594. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1594 of the complaint and therefore deny them.

**COUNT XVII**  
**UNJUST ENRICHMENT**

**(Against APAK Chiropractic, P.C., Aleksandr Mostovoy, D.C., Simon Davydov, Emanuel David a/k/a Emanuel Davydov a/k/a Emik Davydov, Stella Raytsin, Elena Mumin-Akhunov, Practice Wiz, Inc., Innovative Business Strategies, Inc., and MBCC Support Ltd. d/b/a Billing Pros)**

1595. Defendants incorporate by reference each and every response to Paragraphs 1

through 1398 as if fully set forth and repeated herein.

1596. Defendants deny the allegations of paragraph 1596 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1597. Defendants deny the allegations of paragraph 1597 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1598. Defendants deny the allegations of paragraph 1598 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1599. Defendants deny the allegations of paragraph 1599 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1600. Defendants deny the allegations of paragraph 1600 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT XVIII**  
**UNJUST ENRICHMENT**  
**(Against Wellmart Rx, Inc., Simon Davydov, Ruslan Nektalov a/k/a Russ Nekta,**  
**Michael Y. Jacobi, D.O., and Epione Medical, P.C.)**

1601. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1602. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1602 of the complaint and therefore deny them.

1603. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1603 of the complaint and therefore deny them.

1604. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1604 of the complaint and therefore deny them.

1605. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1605 of the complaint and therefore deny them.

1606. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1606 of the complaint and therefore deny them.

**COUNT XIX**  
**DECLARATORY JUDGMENT, 28 U.S.C. §§ 2201 and 2202**  
**(Against Epione Medical, P.C.)**

1607. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1608. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1608 of the complaint and therefore deny them.

1609. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1609 of the complaint and therefore deny them.

1610. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1610 of the complaint and therefore deny them.

1611. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1611 of the complaint and therefore deny them.

1612. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1612 of the complaint and therefore deny them.

1613. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1613 of the complaint and therefore deny them.

1614. Defendants lack knowledge or information sufficient to form a belief as to the truth

of the allegations of paragraph 1614 of the complaint and therefore deny them.

1615. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1615 of the complaint and therefore deny them.

1616. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1616 of the complaint and therefore deny them.

**COUNT XX**  
**DECLARATORY JUDGMENT, 28 U.S.C. §§ 2201 and 2202**  
**(Against APAK Chiropractic, P.C.)**

1617. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1618. Defendants deny the allegations of paragraph 1618 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1619. Defendants deny the allegations of paragraph 1619 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1620. Defendants deny the allegations of paragraph 1620 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1621. Defendants deny the allegations of paragraph 1621 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1622. Defendants deny the allegations of paragraph 1622 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1623. Defendants deny the allegations of paragraph 1623 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1624. Defendants deny the allegations of paragraph 1624 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1625. Defendants deny the allegations of paragraph 1625 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

1626. Defendants deny the allegations of paragraph 1626 of the complaint with respect to APAK and Mostovoy, and lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of that paragraph and therefore deny them.

**COUNT XXI**  
**DECLARATORY JUDGMENT, 28 U.S.C. §§ 2201 and 2202**  
**(Against Wellmart Rx, Inc.)**

1627. Defendants incorporate by reference each and every response to Paragraphs 1 through 1398 as if fully set forth and repeated herein.

1628. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1628 of the complaint and therefore deny them.

1629. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1629 of the complaint and therefore deny them.

1630. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1630 of the complaint and therefore deny them.

1631. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1631 of the complaint and therefore deny them.

1632. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1632 of the complaint and therefore deny them.

1633. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1633 of the complaint and therefore deny them.

1634. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1634 of the complaint and therefore deny them.

1635. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1635 of the complaint and therefore deny them.

1636. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1636 of the complaint and therefore deny them.

**X. DEMAND FOR RELIEF**

1637. Defendants deny that Plaintiffs are entitled to any relief whatsoever that they seek in their prayer for relief such that Defendants pray that Plaintiffs' Complaint be dismissed with prejudice, or alternatively, that a judgment of no cause for action be entered in favor of Defendants and against Plaintiffs, with costs and attorney fees to be awarded to Defendants as allowed by law.

**DEFENDANTS' AFFIRMATIVE DEFENSES**

**FIRST AFFIRMATIVE DEFENSE**  
**(Failure to State a Claim)**

Plaintiffs' Complaint fails to state a claim upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**  
**(Statute of Limitations)**

Plaintiffs' claims are barred, in whole or in part, by the applicable statute of limitations.

**THIRD AFFIRMATIVE DEFENSE**  
**(Release)**

Plaintiffs' recovery is barred, in whole or in part, by the defense of release.



**FOURTH AFFIRMATIVE DEFENSE**  
**(Waiver)**

Plaintiffs waived any and all claims they might have against Defendants.

**FIFTH AFFIRMATIVE DEFENSE**  
**(No Causation)**

Plaintiffs' damages were caused, in whole or in part, by Plaintiffs' own negligence and/or the negligence of a third party.

**SIXTH AFFIRMATIVE DEFENSE**  
**(Failure to Mitigate Damages)**

Plaintiffs' recovery is barred, in whole or in part, by their failure to mitigate damages.

**SEVENTH AFFIRMATIVE DEFENSE**  
**(Collateral Estoppel/Res Judicata)**

Plaintiff's claims are barred by the doctrines of res judicata and/or collateral estoppel.

**EIGHTH AFFIRMATIVE DEFENSE**  
**(Laches)**

Plaintiffs' claims are barred by the doctrines of laches.

**NINTH AFFIRMATIVE DEFENSE**  
**(Statutory Bar)**

Plaintiffs' remedies are limited to those provided by Article 51 of the New York State Insurance Law.

**TENTH AFFIRMATIVE DEFENSE**  
**(Statutory Bar)**

Plaintiffs' claims are subject to arbitration pursuant to No-Fault law and the Federal Arbitration Act.

**ELEVENTH AFFIRMATIVE DEFENSE**  
**(Statutory Bar)**

Plaintiffs' claims are barred by Plaintiffs' failure to comply with New York's No-Fault laws, rules, and regulations, including, but not limited to, Insurance Law § 5106 and 11 N.Y.C.R.R. § 65.

**TWELFTH AFFIRMATIVE DEFENSE**  
**(Ratification)**

Plaintiffs' claims are barred by the doctrine of participation and/or ratification because Plaintiffs ratified, approved, confirmed, and participated in the conduct forming the basis of Plaintiffs' Complaint.

**THIRTEENTH AFFIRMATIVE DEFENSE**  
**(Pai Delicto)**

Plaintiffs' claims are barred by the doctrine of in pari delicto, as Plaintiffs bear at least substantially the same responsibility for any alleged losses as do Defendants.

**FOURTEENTH AFFIRMATIVE DEFENSE**  
**(Accord and Satisfaction)**

Plaintiffs' claims are barred by the doctrine of accord and satisfaction.

**ADDITIONAL DEFENSES**

Defendants reserve the right to supplement or amend this answer, including through the addition of further affirmative defenses, based upon the course of discovery and proceedings in this action. Defendants also incorporate by reference, reiterate, and preserve any and all defenses put forth by all co-Defendants in their respective answers.

**JURY TRIAL DEMAND**

Defendants demand a trial by jury of all issues so triable.

**PRAYER FOR RELIEF AGAINST PLAINTIFFS**

**WHEREFORE**, Defendants ask the Court for the judgment as follows:

- 1) Dismissing the claims against Defendants in their entirety;
- 2) Awarding Defendants costs and attorneys' fees with respect to this action; and
- 3) Granting such other and further relief as the Court deems appropriate.

Dated: October 1, 2021  
Brooklyn, New York

Respectfully submitted,

/s/ Oleg A. Mestechkin

Oleg A. Mestechkin, Esq. (OM4108)

Wing K. Chiu, Esq. (WC5637)

Nancy Lam, Esq. (NL4630)

**MESTECHKIN LAW GROUP P.C.**

1733 Sheepshead Bay Road, Suite 29

Brooklyn, New York 11235

Tel. (212) 256-1113

Fax. (646) 365-2069

[om@lawmlg.com](mailto:om@lawmlg.com)

[wkc@lawmlg.com](mailto:wkc@lawmlg.com)

[nl@lawmlg.com](mailto:nl@lawmlg.com)

*Attorneys for Defendants Aleksandr Mostovoy,  
D.C. and APAK Chiropractic, P.C.,*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 1, 2021, I served the foregoing document via electronic filing with the Clerk of the Court using the CM/ECF filing system.

/s/ Nancy Lam

Oleg A. Mestechkin (OM4108)

Wing K. Chiu, Esq. (WC5637)

Nancy Lam (NL4630)

**MESTECHKIN LAW GROUP P.C.**

1733 Sheepshead Bay Road, Suite 29

Brooklyn, NY 11235

Tel. (212) 256-1113

Fax. (646) 365-2069

[om@lawmlg.com](mailto:om@lawmlg.com)

[wkc@lawmlg.com](mailto:wkc@lawmlg.com)

[nl@lawmlg.com](mailto:nl@lawmlg.com)

*Attorneys for Defendants Aleksandr Mostovoy,  
D.C. and APAK Chiropractic, P.C.*